

About the Municipal Engineers Association (MEA)

The MEA is a non-profit Association representing the interests of over 1,200 licensed professional engineers in Ontario. The majority of our members are employed by over 100 Ontario municipalities, representing 90% of the population of Ontario. We also have members from provincial agencies, conservation authorities and consulting engineers who are designated as the engineer-of-record for small Ontario municipalities.

For over 60 years the MEA and its members have provided various specific expertise associated with municipal engineering in Ontario. MEA, together with MTO, are the co-proponents of Ontario Provincial Standards & Specifications ; and MEA is the proponent for the Municipal Class Environmental Assessment (MCEA). The MCEA was first developed/prepared by the MEA in 1987 on behalf of Ontario municipalities and, since its inception, the MCEA process has been a collaboration between the Ministry of Environment, Conservation, and Parks (MECP) and the MEA.

Summary of Bill 212: Reducing Gridlock, Saving You Time Act, 2024

- Ontario municipalities must apply to the Minister of Transportation if a proposed bike lane will eliminate vehicle travel lanes.
- The application needs to include an evaluation of how this change will affect vehicle traffic, typically through a Traffic Impact Study.
- Bike lanes will not be approved if the Minister decided they would significantly hinder the flow of motor vehicles.
- The Minister also has the authority to review existing bike lanes that were created through the removal of vehicle travel lanes.
- Municipalities are required to provide traffic data for these reviews.
- Bike lanes are defined as any part of a highway that is fully or partially designated for bicycle use.

MEA's Position on Bill 212: Reducing Gridlock, Saving You Time Act, 2024

Municipal transportation systems consist of extensive networks of roads, sidewalks, rails, trails, bridges, tunnels, and countless intersections, all connecting millions of starting and ending points. People use various methods to travel—driving, biking, walking, rolling, or riding transit—and choose their preferred mode based on their needs and available infrastructure.

Traffic congestion problems cannot be solved by looking at a single road corridor or road user; it requires comprehensive transportation planning and consultation tailored to the unique realities of different regions. Municipalities already undertake various studies and analysis when recommending these improvements. These improvements start with transportation

master plans and active transportation master plans which lay the framework and guiding principles. Engineers also work closely with many different municipal services to coordinate the enhancements to a road corridor prior to implementation. This includes, traffic engineering, planning and development, transit, walkability, cycling, accessibility, and emergency access needs.

Local municipalities have the best understanding of their transportation networks and challenges and can plan accordingly for effective long-term solutions. Meanwhile, the provincial government remains best suited to address large-scale infrastructure projects that link communities, such as expanding the GO service, managing significant capital transit initiatives, and overseeing Ontario's highways.

Municipalities are best equipped to handle the transportation networks within their jurisdiction. No single road improvement will alleviate congestion. Consideration must be given to trip origin and destination, as well as the connections of the entire network for all road users. Developing a balanced multi-modal transportation network that considers future growth and evolving needs of the community is a crucial planning exercise that often includes a mix of roads, cycling paths, sidewalks, trails, and public transit options. The Province should enable municipalities to address traffic congestion in a comprehensive way, free from unnecessary bureaucratic obstacles and approval processes, while concentrating on larger-scale issues that fall within their purview.

Adding another approval layer to transportation planning contradicts the work this government has done over the years to remove red-tape, accelerate building and expand municipal infrastructure to meet the Province's growing needs. The proposed new approval process under Bill 212 will hinder and slow down municipalities' ability to address transportation challenges efficiently. Additionally, if enhancements are contingent on the Minister approval, municipalities are at risk of spending substantial amounts of taxpayer's funds on studies and consultation, only to face potential denial. The gaps in the proposed legislation create ambiguity, making it unclear and appearing more subjective as to what will be approved or denied.

Further, it is not clear how the bureaucratic process will integrate the work required to review every bike lane application from across the Province. Ministry staff already have the opportunity to review and comment on the transportation master planning documents under the *Municipal Class Environmental Assessment* process. It is also notable that an increase in workload is likely to be placed on the Province's engineers, who have are currently in the midst of a labor dispute. Bill 212 places an undue burden on the Ministry of Transportation to undertake work that should be completely within the municipal sphere of jurisdiction.

Building and maintaining cycling infrastructure is a benefit to our Province. Fewer cars on the road, safer options for people to get around, reducing the cost of roadways, and freeing people from the financial burden of automobiles during an affordability crisis are goals that are objectively positive and are worked on by Municipalities everyday. The MEA calls on the Province to follow the evidence, and leave the planning and implementation of cycling infrastructure to municipalities.

Questions associated with Bill 212 Reducing Gridlock, Saving You Time Act, 2024

- The term “unduly diminish the orderly movement of motor vehicles” is not defined, leaving its interpretation to the Minister’s discretion.
- The legislation only considers traffic impacts from the loss of travel lanes to bike lanes and does not address reductions in road widths for other reasons.
- It is unclear whether traffic impacts should be evaluated based on actual vehicle movement or theoretical capacity.
- The focus on traffic impacts may be limited to individual roadways rather than the overall network.
- As the legislation focuses on vehicular travel lanes, there are no restrictions on removing parking lanes since they do not affect vehicle movements.
- There is no clear prohibition against narrowing roads, which could allow for the implementation of wider sidewalks or multi-use paths, not specifically classified as bike infrastructure.
- There is no indication that roads cannot be narrowed if they are deemed overbuilt when bike lanes are not added.
- The legislation does not specify that roadways cannot be pedestrianized, as this is not explicitly categorized as bike infrastructure.

Conclusions

The MEA shares the province’s concerns with respect to the impact of traffic congestion in Ontario. Our members will continue to use their professional expertise to address congestion and the safe and efficient movement of all forms of traffic within the communities they serve. The MEA urges the Province to re-evaluate the approach taken within Bill 212, *Reducing Gridlock, Saving You Time Act* as this proposed legislation adds additional red-tape to municipal processes. There are a multitude of other opportunities that can be considered to address traffic congestion without impeding a municipality’s ability to properly manage their transportation network.

MEA would be pleased to meet with the Minister to discuss our concerns and opportunities to work together to address the congestion experienced throughout the Province.