



HEALTHY COMMUNITIES • SUSTAINABLE COMMUNITIES

January 25, 2013

Mr. Michael DeRutyer
Policy Officer
Ministry of Transportation
Policy and Planning Transportation Services
Transportation Planning Branch
Environmental Policy Office
301 St. Paul Street, Floor 2
St. Catharines, ON L2R 7R4

EBR Registry Number: 011-7552

Ontario Ministry of Transportation Draft Cycling Strategy

Dear Sir:

The Ontario Professional Planners Institute (OPPI) appreciates the opportunity to comment on the *Ontario Ministry of Transportation Draft Cycling Strategy*. As key stakeholders in Ontario's planning system, we are providing comments in support of cycling as a safe, viable and convenient mode of transportation for both utilitarian and recreational purposes. We believe that a robust strategy will contribute towards increased policy development, research, planning and implementation across Ontario. OPPI is the recognized voice of the Province's planning profession. Our almost 4,000 members work in government, private practice, universities, and non-profit agencies in the fields of urban and rural development, urban design, environmental planning, transportation, health, social services, heritage conservation, housing, and economic development. Our Members meet strict practice requirements and are accountable to OPPI and the public to practice ethically and to abide by a Professional Code of Practice. Only Full Members are authorized by the Ontario Professional Planners Institute Act, 1994, to use the title "Registered Professional Planner" (or "RPP").

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We acknowledge the significance of the Ministry's policy framework and strategic direction. It cannot be underestimated as to how this can increase the modal share of cycling and result in improvements for safer cycling conditions across Ontario. It is hoped the Ministry's Cycling Strategy establishes a clear vision and set of values that can be translated into tangible action for the Province, municipalities, the not-for-profit sector, and cycling organizations.

We welcome an opportunity to meet with you and your staff to further discuss our submission or answer any questions that you may have about it. To schedule a meeting or for further information, please contact me at (416) 668-8469 or by email at policy@ontarioplanners.ca

Sincerely,

A handwritten signature in black ink, appearing to be 'L.R.' followed by a horizontal line.

Loretta Ryan, MCIP, RPP
Director
Public Affairs

Ontario Professional Planners Institute

Ontario Ministry of Transportation Draft Cycling Strategy Comments from the Ontario Professional Planners Institute

Overview

Cycling plays a significant role in a multi-modal community transportation system that is safe, efficient, convenient, equitable, and based upon good policy and planning principles that serve present and future generations of Ontarians.

On June 21, 2012, OPPI issued *Healthy Communities and Planning for Active Transportation – A Call to Action*. <http://ontarioplanners.ca/PDF/Healthy-Communities/2012/Planning-and-Implementing-Active-Transportation-in.aspx>

The Call to Action calls upon planners, the government of Ontario, municipalities and the public to make non-motorized forms of travel a mainstay of daily life throughout Ontario's communities.

Policies and practices established through official plans, transportation plans, design guidelines and engineering standards often highlight the value of active transportation but too often fail to provide the tools required for implementation. To take active transportation from policy to action, requires a multi-modal transportation system and both "hard" (infrastructure) and "soft" (programs) interventions. We hope that this Strategy will evolve to establish an enduring framework to accelerate planning, policies and recommendations towards implementation of cycling programs and infrastructure.

Key Issues for Consideration

As part of our review, OPPI would like to bring to the attention of the Ministry the following key issues for consideration.

The Intended Audience

The vision expressed in the Minister's cover letter on page 2 indicates that this document is a Cycling Strategy for Ontario. In contrast, the premise of all action items under Section 2 is that this is a Cycling Strategy for the Ministry of Transportation. We respectfully encourage the Ministry and Province to identify this as a Cycling Strategy for Ontario and identify activities that can be undertaken by all of the Province's ministries and agencies to achieve the vision "*for a safe cycling network that connects the Province, for collision rates and injuries to drop, and for everyone from the occasional user to the daily commuter to feel safe when they get on a bike in Ontario*".

Content & Usability

We encourage the Ministry to improve the relevance and usability of the document by ensuring the content is comprehensive and substantive, by organizing the content in a way that eases readability, and by ensuring the document's design and layout is of a similar calibre as other plans and documents that have recently been prepared by the Province of Ontario (e.g. Mobility Hub Guidelines, Transit Supportive Guidelines, Sustainability InSight).

Overall, there is insufficient detail given to the actions of the strategy to consider this as a comprehensive document that is capable of significantly advancing cycling in the Province. There is little detail concerning how specific actions will be implemented, how their success will be measured, what the preferred outcomes of the actions are, and what the specific timeframes are for implementation. The proposed strategy does not convey an overall impression to the reader that cycling holds the same level of priority as other modes of transportation and the level of detail provided is not commensurate with other strategies produced at the Ministerial level.

The Process

OPPI strongly supports the Province of Ontario's efforts to plan and provide for cycling infrastructure, programs, policies and regulations. As an organization that promotes best practices in community planning, OPPI would have preferred to see a more collaborative and research-based approach to formulating the Cycling Strategy. Our desire in this regard is not to delay the process, but rather to ensure the final Cycling Strategy represents a widely-supported foundation for the Province's work with regard to cycling.

Promotion and Awareness

A core component that is missing from the Cycling Strategy is promotion and awareness. While this item may go beyond the scope of the Minister's vision, we believe it is essential for increasing the bicycle mode share and achieving broader Provincial objectives related to sustainability and public health. Promotion and awareness programs are used to provide employees and residents with information on what bicycle infrastructure exists in their neighbourhoods, what they need to know to start riding to school or work, and how they can make their workplace, school and neighbourhood more bicycle-friendly. Promotion also includes hosting events that raise the profile of cycling.

From a cycle-tourism perspective, promotion and marketing is essential. While the Cycling Strategy touts the economic benefits of Velo Quebec's Route Verte, it fails to provide any commentary on what actions will be undertaken by the Province to support cycle tourism in Ontario. Additional actions addressing cycle tourism are needed within the Cycling Strategy. Velo Quebec, for example, offers information on routes, maps, and accommodations.

Bicycle Parking

The provision of bicycle parking (including weather-protected and secure parking for residents and employees) is essential for promoting bicycling as a practical mode of travel. A new bicycle parking section of the Cycling Strategy could outline model bicycle parking design guidelines and standards, and include language to encourage municipalities to adopt mandatory bicycle parking requirements for non-residential and multi-unit residential uses. To lead by example, the Province could also commit to providing safe and secure bicycle parking facilities for its employees and visitors to its public buildings and service outlets.

Bikes & Transit

Combining bicycle and transit trips is a great way to enhance the range, flexibility and convenience of these two modes. The benefits of bike-and-ride trips should be reflected in the Cycling Strategy, along with a commitment to provide high quality bicycle parking facilities (short-term and long-term/secure) at all Provincial transit stations/stops (such as those associated with Metrolinx/GO Transit projects). Other priorities should be to provide safe station access for cyclists, and facilities for transporting bicycles on transit (e.g. bike racks or space onboard vehicles). Any existing Metrolinx/GO programs or activities should be highlighted as part of the Cycling Strategy.

Implementation

Section 2.3 of the Cycling Strategy begins to outline an implementation strategy by addressing monitoring, research and coordination with stakeholders and Provincial partners. What is missing, however, is a detailed outline of the cost of implementing the Cycling Strategy and an allocation of funding. An implementation timeline with priority actions and milestone targets is also needed to build momentum and track progress towards implementation.

Comments

OPPI has assembled the following comments, organized as these appear in the Cycling Strategy and corresponding page number for ease of interpretation and review.

Section 0 – Minister’s Letter

p.2 - Consider revising to “Cycling is an increasingly popular means of transportation, exercise, tourism and recreation.”

p.2 – References are needed for the data provided in this letter, including in the first paragraph (bicycle use among Ontarians) and the third paragraph (the safety of Ontario’s roads).

p.2 - “Ontario has the safest roads in North America, bar none, and the

second safest in Canada for cyclists.” Does this statement intend to say that Ontario has the safest roads for automobiles in North America and the second safest in Canada for cyclists? As stated, it indicates that we’re number one in North America and second in Canada for the same transportation method.

Section 1 – Context

Cycling in Ontario

p. 4 - First paragraph – References/data sources should be provided for the research commissioned by the Ministry. Sharing information is also an important way for the Province to support cycling-related work carried out by municipalities and other organizations across Ontario.

p.4 - General – A more comprehensive analysis of challenges faced by cyclists and providers of cycling infrastructure and programs, and opportunities to address these challenges is missing. The context should also include an analysis of who are the Ministry’s partners in implementing the Cycling Strategy.

Benefits of Cycling

p.4 - The following are suggested text for consideration:

Reinforcing the relationship between transportation and land use planning – Cycling can positively influence land use planning by encouraging human scale development, supporting trip linking with walking, public transit and ridesharing and promoting more sustainable land use patterns that are mixed-use with an emphasis on intensification.

Promoting a multi-modal community transportation system – Cycling represents an integral part of a balanced transportation system and provides mobility options for citizens of various ages and abilities, as well as, those who choose not to or are unable to operate an automobile. Bicycles take up less space, require fewer resources, and can efficiently move people in comparison with other modes of travel.

The Strategy should reflect the diversity found within the cycling community and the different needs related to activities such as cycle commuting, recreational cycling, cycle touring, mountain biking, couriers and cargo biking, and sport and competitive cycling.

What We Are Doing at the Provincial Level

With respect to the Planning Act (1990) and Provincial Policy Statement (2005), there are additional opportunities in conjunction with this strategy to introduce active transportation policies in communities across Ontario. This would assist in reinforcing the role of cycling as a viable mode of transportation and their inclusion in the land use planning system in terms of infrastructure. OPPI is pleased to have had the opportunity to submit

comments on the recent Provincial Policy Statement review, these include the following key points as these relate to cycling:

- *"The proposed revisions to the policies are clear and the inclusion of active transportation enhances this policy. Consideration should be given to a policy to encourage planning authorities to establish targets for active transportation."*
- *"The notion of complete streets would provide further support to the development of active transportation through comprehensive planning."*
- *"The emphasis on active transportation is excellent. If the intent of this emphasis is to be realized, coordination is required with the administration of the Highway Traffic Act, the transportation engineering profession and public works departments."*

(A copy of the OPPI submission on the PPS can be found at: <http://ontarioplanners.ca/getattachment/d6651f17-78e5-4e4d-9957-74e79094ea94/Provincial-Policy-Statement-Five-Year-Review-Publi.aspx>)

p.5 – The Provincial Policy Statement discussion should specifically reference draft policy 1.5.1, which states that:

"Healthy, active communities should be promoted by:

- a) planning public streets, spaces and facilities to be safe, meet the needs of pedestrians, foster social interaction and facilitate active transportation and community connectivity;"*

p.5 – Further to the comment above, the Cycling Strategy should clearly be positioned as part of the Province's planning framework, which includes the Provincial Policy Statement, Places to Grow, The Big Move, and supporting guidelines.

What We Are Doing at the Ministry of Transportation

We are encouraged that the Ministry is taking a position to actively promote cycling and increase cycling safety. The OPPI membership is affected by all four aspects of the Ministry's actions – infrastructure, safety, planning, and research.

p.7 - Under the heading "Planning," we request that the Ministry provide tools and resources that are easily accessible, such as a dedicated webpage within the Ministry website. Provincial policy, guidelines and standards are often the first place for planners to gather information for their projects ranging from policy development to design to implementation.

p.7 - Under the heading "Research," it is recommended information pertaining to the comprehensive review of existing and planned cycling touring routes and Bicycle Survey for the Greater Golden Horseshoe be made available for public viewing.

pp.4-7 - This comment is with regards to the organization of information in these sections. Information should be organized according to the priority action areas that form the basis of the Strategy (e.g. Infrastructure, Education and Legislation, and Monitoring, Research and Coordination, and any others that are added for the final draft), rather than by what other ministries are doing, and what the Ministry itself is doing. Specific program examples could also be highlighted as call-outs.

pp.4-7 - Program details and references throughout are lacking. For the work being undertaken by the Ministry, much more detail is needed, e.g. *what* is the Ministry doing to update its bikeways planning and design guidelines, and *when* does it plan to add new information on cycling to the Driver Handbooks.

Section 2 – A Cycling Strategy for Ontario’s Ministry of Transportation

General comment for this Section 2 – For reference purposes, it would help if the actions/commitments were numbered.

p.8 - The title of this section should convey that this is a Cycling Strategy for Ontario, not for Ontario’s Ministry of Transportation.

2.1 Enhancing Cycling Infrastructure in the Province

p.8 – The list of cycling infrastructure options should be updated to include all contemporary facility options, such as sharrows, bike boxes, cycle tracks/separated bike lanes, bicycle boulevards, and contra-flow bike lanes.

Leading the Identification of a Province-Wide Cycling Network

p.8 – Suggested renaming of this section to “Creating a Province-Wide Cycling Network.”

pp.8–9 - In reference to the sentence “In general, most utilitarian or daily cycling occurs on municipal roads, while long-range recreational cycling mostly takes place on Provincial roads,” in many instances longer range trips often occur on municipal roads as exhibited by a number of regional municipalities developing their own active transportation master plans and fostering connections between both urban and rural destinations. The role of a Province-wide cycling network would provide a greater number of linkages interfacing with municipal cycling networks and provide for a cycling route in some communities in need of inter-municipal connections.

pp. 8-9 -The strategic direction outlined by the Ministry to develop a Province-wide cycling network is not well-defined. A greater emphasis on the Province-wide network accommodating utilitarian cycling, such as for travelling to work, school and errands, would be beneficial and coincide with investments made by communities. We encourage the Ministry to take this into consideration for the development of a Province-wide network.

p.8 - With respect to the addition of a cycling component on the construction of new or rehabilitation of Provincial highways, it is imperative a process be established that is inclusive for the accommodation of cycling. Based on the existing text, it appears cycling facilities will only be considered in exceptional cases rather than on a routine basis.

pp.8–9 - In terms of identification of priority projects, criteria should be developed to inform stakeholders of the merits of a candidate route and network, as well as, establishing a process for municipal consultation. Comments specific to the outlined criteria for warranting a candidate cycling route include the following:

- “Could form part of a Province-wide cycling network” – It is assumed that Ministry intent and involvement would be based around the Province-wide cycling network. It is suggested the Province-wide cycling network could provide connections to planning/existing municipal networks.
- “Have no viable alternative route” – Further definition is required. A cycling route should be based upon criteria such as directness to destinations, facility types and physical site characteristics.
- “Have demonstrated demand for cycling” – This should be revised or deleted in recognition that demand for cycling may come once the improvement is implemented.
- “Are, or can, reasonably made safe” – All cycling facilities should be designed, operated and maintained at safety levels to the same extent as facilities for motor vehicles.
- “Have strong local support” – Measures should be identified to the process for gauging public support and opinion for cycling facilities. This may form part of the planning and monitoring process.
- “Are cost effective” – Further definition is required. Cost-benefit analyses for active transportation facilities are an emerging area of research. The decision for inclusion of the value of cycling facilities should be based on connectivity, as well as, existing or potential demand in the decision-making process for expenditure.

pp.8–9 - Additional suggestions for criteria may include identifying direct routes between settlement areas/destinations, improving cyclist safety through infrastructure improvements, encouraging increased cycling demand and promoting economic development.

p.8 (footnote #6) - The Highway Traffic Act currently restricts the use of paved shoulders for cycling. A number of engineering studies and requests by municipalities (especially rural communities) have highlighted the need for this legislative change. Paved shoulders are a cost-effective investment that often provides for vital connections between communities and promotes rural cycling as a legitimate mode of travel. The construction of wider paved shoulders and rehabilitation of existing paved shoulders are recommended.

p.9 - The text "When a municipality or stakeholder groups requests the addition of a cycling component to a Provincial highway construction project, the Ministry will consider partnership agreements with municipalities or other stakeholder groups for additional costs, subject to available funding." We encourage the Ministry to take a leadership role to accommodate active transportation users on all of its Provincial highway projects (except where cycling is explicitly prohibited). Municipalities have limited revenue sources and are already responsible for providing much of the cycling infrastructure across Ontario is on municipal roads.

The establishment of parameters where the Ministry would "consider" all costs or a cost partnership with a municipality and other partners to include cycling infrastructure in Ministry highway construction projects would not only generate interest but set precedents to develop cycling facilities. One approach might be for the Ministry to permit up to a certain percentage of its annual Province wide capital budget for highway improvements to be used to incorporate active transportation infrastructure in the parts of the Province where it is thought to be most effective. The Province has expressed its interest in promoting cycling through the Provincial Policy Statement and should lead by example.

Supporting Municipalities in the Development of Local Cycling Networks

Assist with Infrastructure Design

In reference to assisting with infrastructure design, we encourage the Ministry to be an active partner in infrastructure development in consultation with municipalities and other stakeholders. There may be locations and conditions that are mutually beneficial to support a cycling bridge or improve an existing structure (interchange/non-interchange crossing) that may be consistent with the Province-wide or a regional cycling network. In recognition of fiscal restraints, the responsibility for costs should not be totally borne by the municipality as this only serves as a deterrent for the development of cycling facilities that interface with Ministry facilities or in providing a cycling route connection.

The Ontario Ministry of Transportation is the controlling agency where a controlled access road (Highway 400 series) intersects with a local road. We recognize and respect the primary role and function of an interchange. We ask, however, that the Ministry review how bicycles can be accommodated at such interchanges or possibly consider alternative initiatives. At the local level, the interchange represents a grade separated crossing of the controlled access facilities. Local bicycle networks naturally focus on such a crossing condition. We believe that further guidance and direction should be made available at this crucial focal point. Perhaps further strategic guidance should be provided in the form of an alternative for local government. Such an alternative could be initiatives to ensure mid-block crossings of the controlled

access facilities. The Ministry could consider a capital contribution of bicycle lanes on such a mid-block facility. The local area gains an important community crossing which also contains provision for bicycles.

Providing Guidance Documents

p.9 – Consider renaming this section “Promoting Best Practices in Bikeway Design”.

p.9 – Add a requirement that the guidelines be reviewed at least every five years to ensure these incorporate and demonstrate best practices in bikeway design, including all contemporary bikeway design types and components (e.g. including pavement markings, signals, signage and other wayfinding tools, etc.).

Access to Funding for Municipalities

p.9 - 10 – OPPI strongly supports Provincial funding for municipalities as they implement local cycling networks. More detail is needed here regarding the Municipal Infrastructure Investment Initiative (e.g. eligibility requirements, past disbursements, allocated funds for future years, what the Province is or will be doing to promote the fund). More detail is also needed about the other options that will be explored “to include cycling within other Provincial funding programs”. Ideally, the Cycling Strategy should include a funding strategy that specifies these details and other financial considerations.

2.2 Enhancing Cycling Safety through Education and Legislation

Public Education for Cyclist and Drivers

Educating road users about safety is clearly an important educational focus. If cycling truly is to become a major form of transportation in the Province, particularly for commuting rather than just recreation, a culture and behavioural change is required to encourage cycling as a viable mode. The Ministry should give further consideration to education initiatives targeted at championing the wider benefits of cycling with respect to core issues such as health, the economy, the environment and community building. These should be linked back to the benefits listed in Section 1.

p.10 – The cycling skill guides should be listed, along with information on where these can be accessed online and in print in communities across Ontario. We encourage the Ministry to establish distribution targets (for print distribution and on-line views and downloads).

p.10 – Please provide more details regarding the local road safety organization and educational activities that are funded by the Ministry. Details regarding how much funding have been distributed to-date, and how much has been allocated for future years should be specified. The Ministry should also provide information on how groups can access the funding, or

where that information is available.

p.10 – With regard to the Driver Handbooks, please specify how often (in number of years) these are updated, and when an updated version with new information and illustrations on bikeways and sharing the road with cyclists is expected to be published.

p.10 – The Province should also consider introducing cycling skills training through the public school system, and provide funding to subsidize and/or promote CAN-BIKE courses for adults.

Legislation that Provides for the Safety of Cyclists

p.10 – Specify how often (in number of years) the *Highway Traffic Act* and other legislation is reviewed by the Province. As well, information on specific legislative changes currently being pursued, and any timelines for implementation should be outlined.

p.10 – In support of facilitating the uptake of best practices in bikeway design, we recommend the Province make a commitment to ensuring legislation is amended, as needed, to facilitate the uptake of new bikeway design standards.

2.3 Ensuring Relevancy through Monitoring, Researching and Coordinating

Monitoring and Research

It is acknowledged the predecessor to the Cycling Strategy was the Ministry Bicycle Policy in 1992. It is important that the strategy be transformed into policy and legislation (i.e. changes to the Highway Traffic Act) that is robust to be followed and applied in an effective and consistent manner. A target date for “timely review” (e.g. every 5 years) should be provided in the strategy.

p.11 - This section could be renamed “Implementation”, with new sections for funding, timelines, and priority actions. This would create a clearer framework for realizing the vision for the Cycling Strategy.

p.11 – In the first paragraph, we encourage the Province to specify a timeline for reviewing the Cycling Strategy, e.g. every five years, and to commit to undertaking meaningful stakeholder consultation as part of the review.

p. 11- In the third paragraph – How the Ministry supports research aimed at improving knowledge related to cycling in Ontario should be specified, and provide details about any research activities the Ministry/Province is undertaking.

p. 11 – Also, in the third paragraph – It appears a reference is being made to

the Province-wide Cycling Route Inventory project that was initiated in 2011, which was intended to inform the development of a Province-wide cycling route network. That data collection project and any outcomes (e.g. selection criteria, the selected routes) should form part of the Cycling Strategy, under the infrastructure section.

p.11 – In the fourth paragraph – In addition to encouraging municipalities to collect and share cycling related data, the Ministry should commit to sharing the data it collects, for example through an open data web site. The Ministry may also consider funding municipal data collection efforts.

Co-ordination

Co-ordination between the planning and research activities of the Ministry of Transportation and the activities of other Ministries is central to ensuring the development of a successful cycling strategy. In particular, there is a need to recognize the importance of linking active transportation planning and land use planning. The best intentions for a more accessible cycling network that connects people with the places they want/need to go will mean little without the promotion of appropriate forms of development that encourage active transportation and set the necessary conditions for increased cycling opportunities.

Greater detail should be given as to how the Ministry of Transportation intends to coordinate with other Ministries and groups. Issues and key activities also need to be identified.

Glossary

In addition to the Glossary, reference to an appendix outlining examples of bicycle facilities and the differences between them would be useful to the reader (e.g. bike lanes). This would supplement the appendix defining the different types of bicycles.

Appendix A – Types of Bikes in Ontario

Motor-Assisted Bicycles (Mopeds)

pp.14–15 - It is somewhat unclear as to what Appendix A achieves in the context of a Cycling Strategy. If standard human-powered bicycles are to be included alongside mopeds in the strategy, then clear consideration should be given to the appropriate manner in which each type of bicycle should be used on the network. This is important from a safety perspective. For example, while it would be appropriate for standard bicycles or e-bikes to use dedicated bike lanes, mopeds should not be using bike lanes owing to potential conflict with other users and in the context of encouraging new cyclists. The Ministry should consider the relative merits of including mopeds in a cycling strategy at all as it sends a conflicting safety message.

Conclusion

The Cycling Strategy represents a first step to initiate a conversation on cycling that can take Ontario from policy to planning to infrastructure. Without an agreed upon vision and clear commitments and timelines, the 'status quo' will remain in place. Further efforts are required by all interested parties to accelerate the implementation of cycling facilities. The proper tools, resources, and guidance will make the Province of Ontario a leader in North America for active transportation and improve the quality of life of Ontarians.