

November 19, 2024

Environmental Policy Office
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**REFERENCE: Environmental Registry of Ontario No. 019-9266
Bill 212 – Reducing Gridlock, Saving You Time Act, 2024 - Framework for
Bike Lanes that Require Removal of a Traffic Lane
Oxford County Submission Comments**

Please accept Oxford County Submission Comments in response to the above noted legislative framework that is proposed by the Ontario Government and posted for public consultation on the Environmental Registry of Ontario (ERO).

Introduction

Oxford County (County) is a two-tier municipal government located in southwestern Ontario comprised of eight area municipalities: the City of Woodstock, Town of Ingersoll, Town of Tillsonburg and the Townships of Blandford-Blenheim, East Zorra-Tavistock, Zorra, South-West Oxford and Norwich.

The County is responsible for operation and maintenance of 655 kilometers (centerline) of roads within the eight Area Municipalities to provide effective and efficient goods and people movement, as well as connectivity to the local and provincial road networks. The County Road network consists primarily of rural roads but also includes arterial roads within urban areas.

Background

The Oxford County Transportation Master Plan (TMP) was updated in 2024 with a continued focus on multi-modal transportation options as the preferred transportation strategy to promote a safe, efficient, and sustainable transportation network through various initiatives including, but not limited to, Active Transportation (AT) and implementation of the 2021 Oxford County Cycling Master Plan (CMP).

The County's CMP identifies approximately 200km of on-road cycling infrastructure as the primary cycling network to provide AT connectivity from rural to urban areas, local AT networks (on and off road), employment areas, and tourism destinations. Cycling infrastructure on rural County roads will generally consist of buffered paved shoulders that will improve safety for both Drivers and Cyclists by providing separation from travel lanes. Cycling infrastructure on County

roads within urban areas will consist of traditional bike lanes, in-boulevard multi-use paths, and protected bike lanes as warranted.

Road diets are identified in the County's CMP as a viable option to accommodate cycling infrastructure within the existing road corridor in urban areas without impacting traffic capacity. Road diets generally involve conversion of a travel lane(s) to a shared center turning lane, that allows spacing for bike lane implementation and improves road safety by minimizing speeding and traffic weaving and reducing rear end collisions associated with turning movements.

Like other municipalities, the County has successfully utilized road diets as a cost-effective approach to accommodate cycling infrastructure within existing road corridors while maintaining traffic capacity and improving road safety, as supported through applicable pre-design traffic studies.

Comments

It is the County's understanding that the proposed legislative framework will require prescribed municipalities to seek provincial approval for the implementation of new bike lanes that require removal of a travel lane and provides provincial authority for removal of bike lanes and return to a lane of traffic.

The County does not feel that a Road Diet constitutes removal of a travel lane but is rather a repurposing of existing lanes in accordance with the Municipal Class Environmental Assessment (MCEA), and respectfully request that Road Diets are given an exemption in the proposed legislation.

That said, the County does not support a provincial review of existing bike lanes and potential removal as this can result in significant budgetary impacts, traffic disruption and negative impacts to established capital and asset management planning.

Conclusion

Implementation of cycling infrastructure promotes active transportation, reduces GHG emissions, improves safety for all road users, and is further supported by the County's Strategic Plan (2023-2026) through development and implementation of multi-modal transportation options and improvements to road safety.

We appreciate the opportunity to comment on the proposed legislative framework and look forward to further opportunities to participate in stakeholder consultation regarding this matter.

Yours truly,



Frank Gross, C.Tech
Manager, Transportation and Waste Management Services

Cc Oxford County Active Transportation Advisory Committee