



**Complete  
Streets**

**tcat** toronto centre for  
active transportation



January 14, 2014

Solange Desautels (A) Supervisor  
Project Review Unit  
Environmental Approvals Branch  
Ministry of the Environment  
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Sent by electronic mail to: [solange.desautels@ontario.ca](mailto:solange.desautels@ontario.ca)

Dear Ms Desautels,

***Re: Municipal Engineers Association (MEA) Municipal Class Environmental Assessment  
Proposed Cycling and Other Amendments Submission – Notice of Proposed Amendment***

Thank you for the opportunity to comment on the proposed major amendment to the cycling, walking and trail provisions in the Municipal Class Environment Assessment (Class EA).

The Toronto Centre for Active Transportation (TCAT), a project of the registered charity Clean Air Partnership, conducts research, develops policy recommendations, and creates opportunities for knowledge sharing, all with the goal of providing evidence and identifying workable active transportation solutions.

TCAT and Dr. Paul Hess at the University of Toronto are currently working together on a research project funded by Metrolinx that is investigating the implementation of Ontario's provincial and municipal policies that seek to encourage walking, cycling and public transit use, with a particular focus on the provision of streets and roadways that improve the accommodation of walking and cycling. We have performed a comprehensive study of the factors that guide the technical details of roadway and street design including the EA process. We found that the current EA process can present an undue barrier for municipalities to improving conditions for walking and cycling on streets and roadways.

Two of the barriers we documented in the EA process are:

1. Projects that involve minimal change to the motor vehicle environment are streamlined without consideration of the negative environmental impacts associated with maintaining current levels of motor vehicle capacity. These projects are preapproved without consideration of alternative designs that accommodate walking, cycling and public transit. The existing design of most Ontario's streets typically provides only basic pedestrian facilities and rarely bicycle facilities.  
*Within the amendment, projects that do not change the number of motor vehicles lanes are still streamlined (#19 in the Appendix 1 Table). While we acknowledge that it would*

*be neither practical nor advisable to slow down road resurfacing projects, nevertheless regularly scheduled projects such as these do present an opportunity to reduce negative environmental impacts and to conform more closely to provincially mandated priorities (e.g. Growth Plan). In some cases, minor changes can improve the active transportation experience and are cost-effective to implement while the road is being resurfaced (e.g. providing wider curb lane widths for cyclists). We recommend that for streamlined projects that municipalities be required to review whether there are any identified plans in place (e.g. Bike Plans) to improve active transportation that could be feasibly implemented at the same time.*

2. New facilities for active transportation that can change the motor vehicle environment (e.g. reconstruction and widening projects) require a more rigorous process which can effectively limit the potential for active transportation facilities to be added to the street. *This is addressed in the amendment in #19 in the Appendix 1 Table. See below.*

Our comments on the proposed changes pertaining to cycling and walking in the Appendix 1 Table amendment are as follows:

No. 1: We are supportive of cycling lanes, multi-purpose paths and sidewalks being included within the definition of linear paved facilities.

No. 3: We are supportive of pre-approving the inclusion of multi-purpose paths and cycling lanes within the construction of the right-of-way. However we do **not** support the *removal* of sidewalks, multi-purpose paths or bike lanes being included in the same schedule. The potential removal of bike lanes should trigger a more rigorous process due to the negative environmental and public health impacts.

No. 19: We are supportive of the clarification that the inclusion of bike lanes does not trigger a higher schedule if the number of motor vehicle lanes is unchanged. However we do **not** support the *reduction* of bike lanes being included in the same schedule for reasons noted above in No. 3.

No. 20: We are supportive of the clarification that changes to motor vehicle capacity warrant a higher level of review.

No. 22: We are supportive of the clarification that re-designation of a linear paved facility includes cycling lanes. However we do **not** support the *removal* of bike lanes being included in the same schedule for reasons noted above in No. 3.

New: We are supportive of the new category that includes under the Class EA the construction of sidewalks, multi-use paths and cycling facilities outside the right-of-way that cost more than \$3.5 million, rather than having these projects trigger an individual EA. However we do **not** support the *removal* of sidewalks, multi-use paths or cycling facilities under 3.5 million being included in Schedule A for reasons noted above in No. 3.

No. 24: We are unclear about the implications of this recommendation specific to reconstruction of water crossing facility and therefore cannot comment.

No. 28: We are supportive of the clarification to ensure cycling is included in the construction of underpasses or overpasses. We would request a revision to this item to allow

projects which are under 3.5 million to be pre-approved as Schedule A, over 3.5 million but under 9.5 million to be classified as Schedule B, and over 9.5 million to be classified as Schedule C. This would be consistent with the new proposed category “Construction or removal of sidewalks, multi-use paths or cycling facilities including water crossings outside existing right of way.”

To summarize, overall we are very supportive of the changes recommended by MEA with the notable exception of the proposal to streamline the removal or reduction of sidewalks, multi-purpose paths, or bike lanes. We also recommend that a review of opportunities to improve active transportation be required for streamlined road projects.

Thank you in advance for your consideration of our comments and recommended changes. We appreciate the opportunity to comment, and for your efforts in improving the EA process to facilitate the inclusion of active transportation facilities.

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy Smith Lea". The signature is written in a cursive, flowing style.

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