



November 20, 2024

*Sent via regulatory registry*

Planning Policy Office  
438 University Avenue, 12th Floor  
Toronto, ON  
M5G 2K8

**Re: Regulatory Registry 24-MTO018 respecting Bill 212 Reducing Gridlock, Saving You Time Act**

Dear Ministry Officials:

I am writing to you today on behalf of the [Association of Municipal Managers, Clerks and Treasurers of Ontario \(AMCTO\)](#) regarding proposed Bill 212 *Reducing Gridlock, Saving You Time Act*.

AMCTO represents excellence in local government, management, and leadership. For over 85 years we have provided education, accreditation, leadership, and management expertise for Ontario municipal professionals. With 2,200+ members working in municipalities across the province, we are Ontario's largest association of local government professionals.

Thank for the opportunity to provide AMCTO's perspective on the proposals currently in front of the Legislature. We appreciate the Government's commitment to build the infrastructure needed to strengthen Ontario's economy, improve traffic flow and make life easier for Ontarians.

We will not be commenting on the technical pieces of the legislation and will restrict our comments related to the overall "big picture" impacts to local residents, local governments and local outcomes. We do however join our municipal association partners in our concern about the Province's intervention in local decision-making related to bike lanes as well as the red tape it is placing on municipalities who want to build active-transportation infrastructure in their communities. As the press release notes, "municipalities would be required to demonstrate that the proposed bike lanes won't have a negative impact on vehicle traffic." It is also expected that the Province will determine whether existing bike lanes will have to be removed.

As the Government is aware, municipalities are already required to provide over 400 reports to the Province on an annual basis. Adding additional reporting requirements which requires municipalities in prescribed conditions to provide significant data on new and existing active transportation infrastructure adds considerable administrative, resource and cost burdens ultimately assumed by the local ratepayer.

Municipalities are responsible and accountable governments with respect to matters within their jurisdiction and are best positioned to understand the needs and wants of their communities, their residents and their local businesses. The proposed bill if passed, will constitute a serious overreach of the Province into local decision-making. The local decision-making process, which is the most open and accountable, considers local voices and the best interests of residents, visitors, and businesses on an evidentiary basis.

We are concerned about the unintended consequences the bike lane proposals will have on local road safety for bicyclists, pedestrians and motorists including potential increases in road safety accidents and fatalities. Not only would this impact the people involved in these accidents, it would also impact emergency services resulting in increased need for first-responders (paramedic, policing and fire services) and increased healthcare resources such as emergency rooms which are already stretched beyond capacity.

Moreover, increased road accidents could result in increased municipal liability which has direct impacts to municipal budgets. As does the forced removal of existing transportation infrastructure resulting in necessary additional construction for roadwork which only further congests local and arterial roads which runs contrary to the Government's stated intentions regarding policy outcomes with the legislation.

The regulatory posting suggests that the financial impact to municipalities will depend on the final regulatory framework, admitting there will be a cost but does not estimate what that cost could be. It should be noted that these costs should factor in not just reporting, or bike lane removal costs, but the overall costs to services provided by municipalities as a result of the unintended consequences this proposal could raise including those related to public safety. Such costs would impact the Province as well.

We would recommend that the Government reconsider such proposals.

Once again, thank you for the opportunity to provide feedback.

Sincerely,

[Originally signed by]

Paul Shipway CMO, AOMC, Dipl.M.A.  
President, AMCTO