



Safe streets  
Healthy city  
Vibrant voice

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October 24, 2023  
Toronto City Hall  
Infrastructure and Environment Committee  
100 Queen Street West  
Toronto, ON M5H 2N2

## RE: IE7.2 - Congestion Management Plan 2023-2026

Dear Chair McKelvie and Members of the Infrastructure and Environment Committee,

The Congestion Management Plan 2023-2026 update represents an important update since it was last updated in 2020. The significant increase in unsafe and inconsistent construction zones across the city has impacted the safety and movement of people.

Since 2022, Cycle Toronto has been working with Traffic Management Director Roger Browne and city staff along with other road safety advocates to address the safety concerns of the wider community to find short, medium, and long-term solutions to improve construction zone safety. We are thankful and appreciative that city staff, as a result, have developed a range of new policies, standards and specifications around construction zones to improve the safety of people by addressing four areas of improvement: 1) communication, 2) safe path of travel, 3) training staff, and 4) enforcement.

Cycle Toronto supports the range of new initiatives being proposed by staff, including the expansion of construction hubs, providing a higher level of construction work zone support, and the creation of a dedicated traffic event management planning team.

**We are very concerned that Transportation Services is seeking to negotiate and enter into an agreement with Toronto Police for the use of callback police officers and special constables to expand the Traffic Agent Program.**

The police, who are currently tasked with enforcing traffic laws, receive a significant portion of the city's budget and are not doing their job with efficiency or transparency. The police have launched biased campaigns targeting vulnerable road users instead of prioritizing the safety of people by ensuring intersections are free from vehicles blocking the box, drivers are following the posted traffic speed, and following other traffic laws (like not texting or otherwise driving while distracted).

**The most effective solution to improving road safety is to build streets that are safe by design, not by relying on police enforcement.** The Toronto Police has acknowledged they have engaged in racist practices and violence toward Black, Indigenous, and other racialized communities, so instead of directing more funds to the police, more investment towards implementing road improvements that physically force drivers to slow down should be prioritized. Besides which, the contractors and

companies that are in charge of the respective construction sites should be tasked with ensuring their safety and the safe passage of people.

Additionally, it is our view that unless the movement of people is prioritized along key transit corridors, and there is sufficient staff to proactively oversee the large volume of construction zones paired with sufficient enforcement, construction sites will remain a significant barrier to the movement and safety of people. Unless these three issues are addressed, the Construction Management Plan will not succeed:

1. **Closing access to vehicular traffic when the public right of way is compromised on the city's subway routes and key TTC streetcar routes during construction to ensure the safe and efficient movement of transit users, people walking, biking and using other micro mobilities as well as emergency vehicles;**
2. **Transportation Services must have the sufficient resources and staff of Project Managers, Site Inspectors, Work Zone Coordinators and Transportation Standards Officers to oversee the proactive and reactive needs of preparing construction permits and enforcing compliance to guarantee construction zone safety at all times in both a proactive and reactive way.**
3. Unless there is a **dedicated and properly resourced enforcement mechanism that doesn't rely on the police** that ensures the safe passage of vulnerable road users over vehicular traffic, the new initiatives and programs outlined in the Construction Management Plan 2023-2026 will not succeed in improving the safety of people around construction zones.

Thank you for your consideration in this important matter.

Sincerely,



Alison Stewart  
Director, Advocacy and Public Policy

*Cycle Toronto is a member-supported charity that works to make Toronto a safe, healthy, and vibrant cycling city for all.*