



November 14, 2024

Toronto City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2  
Attention: Sylwia Przewdziecki

RE: [CC23.1 – Respecting Local Democracy and Cities](#) and  
[MM23.14 – Provincial Overreach and Toronto's Infrastructure](#)

Dear Mayor Olivia Chow and Members of City Council,

This is to express our strong support for the report from the Mayor on Respecting Local Democracy and Cities and the report from the City Manager - Supplemental Report: Impact of Bill 212 Bike Lanes Framework.

Bill 212 is an omnibus bill that would introduce and amend several pieces of legislation, including amendments to the Highway Traffic Act (HTA), specifically as they relate to the Province's proposed Bike Lane Framework. Within this framework: municipalities would be required to seek Provincial approval to allow for new bike lane construction where the design for the bicycle lane would reduce the number of marked lanes available for travel by motor vehicle traffic. Municipalities would be required to submit information to the Ministry about existing bicycle lanes, where the addition of the existing bicycle lane reduced the number of marked lanes for motor vehicle travel. Municipalities would be compelled to collect and provide information about existing bike lanes on a set/periodic basis.

On October 31, 2024, the Province proposed an addendum to the framework that would require the City of Toronto to provide support to the Province to facilitate the removal of bike lanes on Bloor Street, Yonge Street, and University Avenue, or sections thereof, and return them to a lane of traffic for motor vehicles. Additional authorities to facilitate the removal of these lanes would also be included in the legislation including an exemption from the Environmental Assessment Act.

The City Manager's report summarizes the impacts on the City of the Province's proposed Bike Lane Framework introduced within Bill 212, including:

- Likely minimal improvements in travel time once lanes are removed;
- Potential for decreased safety for people cycling and pedestrians, in addition to a potential for increased collision risk for drivers;
- Estimated financial impact of up to \$48 million in additional costs to provincial taxpayers to pay for the removal of existing bike lanes that have been constructed in recent years;
- Lost investment of \$27 million in City costs to install the existing infrastructure.
- As yet unknown additional costs to identify, design, and construct alternative cycling routes, each with their own impacts and infrastructure challenges;.
- As yet unknown additional staff resources and infrastructure costs to redesign and reconstruct these roads to add space for motor vehicles;.
- The impacts from additional repair and construction that would be necessary to facilitate the removal of existing bike lanes, including traffic congestion and business disruption; and
- The impact on broader public health, environment, and economic benefits of active transportation, limiting the City's ability to achieve the TransformTO target of net zero emissions in Toronto by 2040.

The investment in a network of bike lanes represents an appropriate strategy by the City, representing an alternative and less carbon producing transportation management response. The existing road network simply cannot accommodate all those who wish to drive. Bike lanes are an essential component of the City's comprehensive traffic management plan that includes walking, biking, subways, LRTs, and buses. The Province should be supporting the City in this journey - not working at counter-purposes. The proposed Provincial measures represent an entirely inappropriate overreach into the City's affairs and must be resisted by the City and all residents. .

Yours truly,

Geoff Kettel  
Co-Chair, FoNTRA

Cathie Macdonald  
Co-Chair, FoNTRA

Cc: Paul Johnson, City Manager  
Barbara Gray, General Manager, Transportation Services  
Jacquelyn Hayward, Director, Planning, Design & Management,  
Transportation Services  
Kyle Knoeck, Interim Chief Planner and Executive Director, City Planning

**The Federation of North Toronto Residents' Associations (FoNTRA)** is a non-profit, volunteer organization comprised of over 30 member organizations. Its members, all residents' associations, include at least 250,000 Toronto residents within their boundaries. The residents' associations that make up FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal.