



September 12<sup>th</sup>, 2024

To: Infrastructure and Environment Committee  
City of Toronto  
100 Queen St. W, City Hall, Second floor, West  
Toronto, ON M5H 2N2

Subject: **Updates to Congestion Management Plan (Item - 2024.IE16.4)**

Dear Members of the Infrastructure and Environment Committee,

The Toronto Region Board of Trade (the Board), on behalf of its members and business community, is wholeheartedly committed to addressing the congestion crisis and supporting your work in this. Congestion is stifling Toronto; it is an urgent and significant crisis that is contributing to our declining productivity and prosperity. Recent polling<sup>1</sup>, conducted by Ipsos for the Board, confirms that residents are altering their routines and avoiding vital economic activities, such as shopping, going for entertainment, dining out, and visiting family and friends. A staggering 53 per cent of respondents have contemplated moving away outside the GTHA due to traffic and congestion issues.<sup>2</sup>

This is why earlier this year, the Board established a business-led Congestion Task Force, guided by a CEOs' Governing Council, to generate practical short and long-term solutions to tackle the congestion crisis. We have appreciated the opportunity to provide ongoing insights and recommendations as the City updates its Congestion Management Plan (in response to motion 2024.IE15.12), and to engage directly with you, your Worship, and your office – including at the Board's upcoming symposium, *Stuck: Tackling Toronto's Congestion Crisis*.

We would now like to take this opportunity to recommend the following priority areas for immediate action, for consideration in the update to the Congestion Management Plan coming before Council later this month.

### **Improve Construction, Improve Congestion**

68 per cent of Toronto region residents see construction as the main reason for congestion.<sup>3</sup> From ongoing public transit infrastructure and much needed housing development, to replacing over 100-year old watermains, Toronto is the busiest city in North America when it comes to construction.<sup>4</sup> Indeed, construction activity is a major contributor to the GTHA's

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<sup>1</sup> <https://bot.com/News/New-Board-of-Trade-Congestion-Polling-Shines-potlight-on-Congestion>

<sup>2</sup> Ibid.

<sup>3</sup> <https://bot.com/News/New-Board-of-Trade-Congestion-Polling-Shines-potlight-on-Congestion>

<sup>4</sup> <https://www.cp24.com/news/these-are-the-toronto-construction-projects-that-could-wreak-havoc-with-your-commute-in-2024-1.6705070>

economic growth – however, the road restrictions caused by construction are recognized as a primary driver of congestion. Specific measures must be taken now to improve construction both for the immediate and long-term:

- ***Project approval, timelines, staffing, and transparency.*** Lengthy approval times in Toronto can result in simultaneous approvals, causing uncoordinated construction projects. More must be done to expedite the approval process – including considering the need for additional qualified staff to undertake reviews and providing a greater degree of accountability and transparency for contract debriefs and communication of timelines and decisions.
- ***Incentivizing innovation and competition:*** Modern and balanced contractual arrangements should be adopted. The City's current approach to managing contract risk is an example of a culture that does not embrace innovation and is difficult to do business with. Currently, contractors bear most of the project risk, with slow payment forcing contractors to carry financial burdens, and there is a lack of incentives for increased innovation in design and engineering. There is a need to promote a cultural shift towards embracing innovation to increase efficiency and empower technical experts in project management.

### **Limit Lane Closures**

Road closures have indirect costs that are underestimated or not considered in capital decision making. The Board has engaged a third-party consultant, Steer, to help develop a framework to take these externalities into account, with a view to ensuring that infrastructure projects are viewed holistically. For example, the recent decision to implement overnight construction on stretches of the Gardiner was a belated recognition that investing in faster construction mitigates the broader costs to society and the economy.

We also recognize that road closures are often necessary for worker and public safety and, therefore, changes to the regime regulating them require careful consideration. However, based on a scan of peer jurisdictions, there are several areas that emerge as opportunities:

- ***Implement more comprehensive permitting requirements.*** While contractors in Toronto currently provide a rationale and a sketch of their work zone, other cities like Sydney and London require detailed traffic management plans, construction logistics plans, and proof of engagement with relevant agencies. Utilizing a risk and principle-based approach, this could ensure better preparation and coordination for road closures.

- **Adopt off-peak construction:** As seen in New York and Singapore, overnight construction is the norm and not the exception and can help minimize daytime disruptions. London also offers fee reductions for work done outside peak times and for contractors with strong records. Tightening controls, such as limiting the time roads can remain closed before and after construction, could also boost efficiency.
- **Use pricing to incentivize faster construction:** For example, Toronto charges fees by the month, but other cities like London and Singapore charge in smaller increments, such as daily or hourly rates. This method incentivizes contractors to finish projects faster, potentially reducing the duration of road closures.
- **Continuously enhance coordination:** While Toronto has an online intake portal and a Strategic Capital Coordination Office, it still faces challenges such as repeat road resurfacing due to a lack of planning and coordination. Chicago holds monthly coordination meetings to encourage more streamlined project timing and resource sharing, and London offers significant discounts for collaborative work. These tactics can help ease congestion by ensuring more efficient coordination.

We look forward to further engaging with the City on findings of this work in the coming months.

### **Other Measures**

With respect to the other areas noted in motion 2024.IE15.12:

- **Advocacy towards implementing higher fines and automated technology for “Block the Box”:** We fully support the City’s measures to step up “block the box” fines and enforcement, including through the use of automated cameras.
- **Assessment of road occupation congestion management recovery fee changes and peak hour delivery restrictions:** Post-pandemic, consumer preferences have changed as have services, such as e-commerce, in response to that demand. In addition, the competing pressures on land use (e.g., from demand for housing) are weakening our supply chains. We urge the City to take these trends into account and holistically review its goods movement strategy from the perspective of enabling goods movement into and throughout the city, and not adopt one-off measures.

### **Looking Ahead**

Lastly, the Board encourages the City to adopt congestion benchmarks and key performance indicators in all other mobility plans (cycling, goods movement, transit, etc.) to ensure all of



the City's levers are pulling in the same direction. The current mode-by-mode approach risks losing sight of the greater goal of mobility for all road users.

In early 2025, the Board will release its Congestion Action Plan and we welcome the opportunity to continue ongoing engagement.

Sincerely,

A handwritten signature in black ink, appearing to read 'Giles Gherson'. The signature is fluid and cursive, with a long horizontal stroke at the end.

**Giles Gherson**  
President and CEO  
Toronto Region Board of Trade