

April 22, 2025

Mayor Olivia Chow and Members of Toronto City Council
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Re: Congestion Management Plan (IEC 20.3) – City Response to TRBOT *Breaking Gridlock*

Dear Mayor Chow and Members of Council,

On behalf of the Toronto Region Board of Trade, thank you for your continued engagement on the urgent issue of congestion—and for the thoughtful work of senior City staff in preparing the updated Congestion Management Plan.

In a region where trade, logistics, and just-in-time delivery are vital to our competitiveness, gridlock makes it harder for businesses to move goods, for people to access jobs, and for our economy to function efficiently. But as we outlined in our Breaking Gridlock Congestion Action Plan, congestion is more than a transportation challenge—it is a structural economic crisis. Businesses will not invest in new or expanded operations where their people, products, and clients face systemic barriers. Now, amidst global trade disruption and geopolitical uncertainty, we must get our own house in order.

We are encouraged to see that many of our recommendations are reflected in the City's response, including:

- Strengthened enforcement of lane closures and the introduction of meaningful fees;
- Pilots to expand automated enforcement, which we hope will lead to full-scale implementation; and
- Recognition of the need for engineering interventions at key congestion hotspots, including Harbour and York.

We also recognize that other orders of government have a critical role to play, and we will continue to advocate for their support in enabling local action. This includes addressing unfunded mandates, enhancing operating funding for transit and infrastructure, and leveraging legislative tools—such as automated enforcement—to empower the City to act decisively on congestion.

However, to truly break gridlock, two foundational elements remain missing—and we continue to call for their urgent adoption:

1. A Strategic Framework for Major Arterial Roads

Toronto's major corridors are being asked to do too much—carry regional traffic, accommodate curbside deliveries, serve transit and cycling, support patios and parking—all on streets already constrained by long-term construction.

We call on the City to develop a city-wide arterial road framework that:

- Identifies and prioritizes key connector corridors critical to the reliable movement of people and goods, with clear guidance on their primary function—whether for transit, goods movement, or general traffic;
- Establishes criteria for right-of-way trade-offs, ensuring curbside uses such as patios, deliveries, cycling infrastructure, and parking are managed in a way that preserves throughput and reliability;
- Defines corridor-specific performance standards, setting clear benchmarks for mobility and reliability based on each corridor's strategic role in the network.

This type of clarity is common in other global cities—such as Amsterdam's designation of "flow roads"—and Toronto would benefit from a similar strategic approach.

2. A Dedicated Congestion Commissioner or Equivalent Role

Despite ongoing investments, congestion mitigation remains fragmented across City divisions. There is no single person or office responsible for overseeing city-wide impacts, coordinating responses, and ensuring accountability.

We call on the City to establish a dedicated leadership function—such as a Congestion Commissioner—with a clear mandate to deliver measurable outcomes by:

- Coordinating congestion-related planning and mitigation across departments, agencies, and divisions—including stronger collaboration with the TTC and Toronto Parking Authority;
- Developing, track and publicly report on city-wide congestion KPIs and monitor corridor-specific performance standards, ensuring that designated arterials are meeting throughput and reliability targets;
- Identifying and troubleshoot emerging hotspots in real time and assess the cumulative impact of overlapping construction, policy, and operational decisions;
- Having the authority to pause, delay, or potentially stop certain projects by considering current conditions and disruptions, to ensure road use is optimized.

We appreciate the steps the City has taken to align with many of our recommendations and remain committed to supporting bold, evidence-based solutions. Toronto's residents and businesses deserve a transportation system that matches the scale of our ambition—and a congestion strategy capable of delivering it.

Sincerely,



Roselle Martino

Executive Vice President, Policy and Strategic Affairs
Toronto Region Board of Trade