



Ontario Public Health Association
 l'Association pour la santé publique de l'Ontario
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The mission of OPHA is to provide leadership on issues affecting the public's health and to strengthen the impact of people who are active in public and community health throughout Ontario.

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EBR Registry Number 012-2428
Development of the Ontario Municipal Cycling Infrastructure Program

Dear Ms. Edwardson:

On behalf of the Built Environment Workgroup of the Ontario Public Health Association (OPHA), I want to convey OPHA's support for the development of a municipal cycling infrastructure program in Ontario. OPHA is a member-based not-for-profit that has been advancing public health within Ontario for 62 years. We are committed to the prevention of injury and chronic disease and promotion of air quality and sustainable transportation. We were pleased to have played a role in the changes to the Official MTO's Driver's Handbook. We have also provided your Ministry with research into beginner driver education practices as they pertain to sharing the road with cyclists along with resources to support beginner driver education instructors.

Many of our OPHA members recognize that active transportation plays an important role in improving public health, and improving cycling infrastructure is a key component needed to encourage people to cycle more often. We are encouraged by the Ministry's leadership in moving cycling forward, through the #CycleON Strategy and action plan, the proposed amendments to the Highway Traffic Act and this EBR posting.

General Comments

OPHA members work in urban, suburban, rural and northern communities. We know that there are unique challenges in these different settings. Solutions for creating safe cycling infrastructure need to be context sensitive, particularly when it comes to safety. Ontario Traffic Manual Book 18 emphasizes this point: "A direct comparison of the relative safety of different types of bicycle facilities and degrees of separation is difficult. A bicycle facility with greater separation may appear to be 'safer' but may result in more conflicts at intersections and driveways..."(P.25) It is important that project proposals be assessed based on their context, and on the degree to which the project addresses local needs, conditions and priorities. We elaborate on this point further in our response to Question 3.

Question 1a: *What would encourage cycling most?*

Municipal infrastructure is critical. Polling data from 2013 by the Share the Road Cycling Coalition cites safety as one of the main concerns for cyclists. Better infrastructure is identified as the key to unlocking pent-up cycling demand and getting more people on bikes for both transportation and recreation. Seventy eight percent of respondents felt that more people would ride if there was better cycling infrastructure, such as bike lanes and paved shoulders. Seventy four percent believe the provincial government should invest in cycling infrastructure.

OTM Book 18 also cites the largest portion of cyclists who will benefit from better infrastructure as the “interested and concerned”, who make up about 60% of cyclists. This group would like to ride more and may be encouraged by the implementation of designated facilities, particularly those which provide more space between cyclists and motorists. (P. 12)

Many municipalities see the value in improving conditions for cycling, but are at maximum capacity financially, and find it challenging to fit cycling infrastructure into their many budget priorities. Therefore, in order to move cycling forward in the province, this funding program is critical. The proposed amount of \$10 million over three years for municipalities is a commendable, if modest, start. We hope that the government will see the benefits to increasing this fund in the future.

In addition to infrastructure, encouragement and education are required to increase cycling activity. We are pleased that a separate EBR posting identifies resources allocated for cycling education in Ontario.

Question 1b: *Are there additional types of infrastructure the ministry should consider making eligible for funding?*

The list provided is comprehensive and reflects the facility types discussed in OTM Book 18, with one important consideration. There may be instances where a road that is being proposed for adding paved shoulders may not currently be identified as a bike route. For example, in rural areas, road networks are extensive, and improvements for cycling are usually done incrementally as sections of roads become due for reconstruction. For this reason, although a rural road may be used frequently as a cycling route, it may not be signed as such, because it does not have continuous paved shoulders (hence the need to apply to the fund). It is important that paved shoulder projects on a road that is not currently signed as a bike route still be eligible for funding.

Further to this point, it is important that MTO amend regulations in the Highway Traffic Act to permit cycling on paved shoulders.

The “Other Cycling infrastructure” list should include: bike racks for buses and way finding signage for off-road cycling infrastructure.

Question 2: Are there legitimate exceptions to the requirement that eligible infrastructure should be shown in a municipal planning document?

Consider that in the absence of such policies or documents that a municipality can:

- demonstrate that the development of such plans is in progress, or
- demonstrate that there is a commitment to starting to create policies/plans within the period of the proposed project.

This consideration would be helpful for municipalities who may be in the early stages of creating a more bicycle-friendly community, and who wish to start with an infrastructure project and may not yet have the aforementioned policies or plans in place. While planning documents and policies are important to meet long-term goals, there is something to be said for getting something ‘on the ground’ early in order to start building interest, awareness and momentum.

Question 3a: Please prioritize the list of evaluation considerations in order of importance to you or your organization.

Our priorities for the evaluation considerations are as follows, including two new items.

1. Improve rider safety and security
 - The primary outcome of cycling infrastructure projects should be improving safety for people on bicycles. As stated earlier, however, improving safety is context sensitive. OTM Book 18 provides good standards for facility options based on site conditions. The application process should provide the opportunity for proponents to give rationale for their design within the context of their community.
2. Improve connectivity of local cycling networks
 - Connectivity is a critical aspect of an effective cycling network – a good project is not done in isolation, but builds onto existing cycling infrastructure.
 - Improving connectivity also has to do with connecting to key destinations (e.g. schools, workplaces, recreation facilities, etc.) and this aspect should also be included in the evaluation criteria.
3. **New:** Contribute to other municipal goals and activities related to cycling, such as building a local cycling tourism product, supporting cycling events, or promotion and education of safe cycling/share the road.
 - In addition to having plans and policies (as outlined in Q#2), other cycling activities and initiatives underway in a municipality demonstrate its commitment to and vision for cycling as an integral aspect of planning.
4. **New:** Complement a matter of provincial interest
 - For example, provides link to the Waterfront Trail or Greenbelt Route.
5. **New:** Improve cycling access for marginalized populations

- Access to safe cycling for transportation is an important health equity issue. Many people do not drive for health, economic and other reasons and need safe, accessible, affordable options such as cycling.
6. Enable and demonstrate partnerships
 - The participation of a variety of partners demonstrates community support and buy-in. This is important because improving cycling infrastructure has multiple benefits (e.g. safety, health, environment, road maintenance, economic), and a project is more likely to succeed when many stakeholders support and contribute. Stakeholders can also implement educational and promotional activities which are essential aspects to encourage cyclists to make use of new cycling infrastructure.
 7. Support innovation and collection of cycling-related data/research
 - Given that one of the program’s objectives is that “innovation in cycling infrastructure is encouraged”, this is an important criteria for evaluation. Pilot projects that are effectively evaluated can help establish new design guidelines and standards for future applications and should be allowed for funding allocation.
 - Research, evaluation and data collection require resources. Innovative pilot projects should be allowed to allocate some of their project funding to evaluation and data collection.
 8. Increase ridership levels
 - This is important, however, in small and rural communities, measurement may be a challenge, and changes may take time.
 9. Be cost-effective
 - This seems subjective. What is cost-effective in one situation or jurisdiction may not be in another.

Question 3b: Are there any other considerations that the Province should make in its evaluation of projects?

Regarding the list of considerations, while the list is comprehensive, it requires greater clarity as to how each will be assessed such that projects are evaluated according to their context. Any criteria used need to be examined to ensure that they do not bias in favour of one kind of environment or facility. For example, when evaluating a project in relation to connectivity, how will it be assessed so that it captures rural settings in which roads tend to be longer and destinations further apart? Or, how will safety be measured so that the absolute higher frequency of collisions in urban settings does not bias against rural settings?

Thank you for the opportunity to provide comment on the development of the Ontario Municipal Cycling Infrastructure Program. We would welcome the opportunity to discuss this further. Please feel free to contact the undersigned if you have any questions or require clarification on our suggestions.

Sincerely,



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