



Ontario Public Health Association
 l'Association pour la santé publique de l'Ontario
 Established/Établi 1949

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.

44 Victoria St., Suite 502
 Toronto, ON M5C 1Y2

Tel: (416) 367-3313
 Fax: (416) 367-2844
 E-mail: admin@opha.on.ca
www.opha.on.ca

President
 Ellen Wodchis
 E-mail: president@opha.on.ca

Executive Director
 Pegeen Walsh
 E-mail: PWalsh@opha.on.ca

Constituent Societies

Association of Ontario
 Health Centres (AOHC)

Association of Public Health
 Epidemiologists in Ontario (APHEO)

Association of Supervisors of
 Public Health Inspectors of Ontario
 (ASPHIO)

Canadian Institute of Public Health
 Inspectors (Ontario Branch) (CIPHIO)

Community Health Nurses'
 Initiatives Group (RNAO)

Health Promotion Ontario (HPO)

Ontario Association of Public
 Health Dentistry (OAPHD)

Ontario Association of Public Health
 Nursing Leaders, (OAPHNL)

Ontario Dietitians in Public Health
 (ODPH)

Ontario Society of Physical Activity
 Promoters in Public Health (OSPAPPH)

Charitable Registration
 Number 11924 8771 RR0001

March 7, 2018

Katerina Minaeva
 Senior Policy Analyst
 Ministry of Transportation
 Policy and Planning Division
 Transportation Planning Branch
 Environmental Policy Office (Toronto)
 777 Bay Street, Suite 700
 Toronto Ontario M7A 2J8

Re: #CycleON: Action Plan 2.0, EBR registry number 013-1837

Dear Ms. Minaeva;

On behalf of the Ontario Public Health Association (OPHA), we applaud the provincial government for its continued support of #CycleON: Ontario's Cycling Strategy and the work being led by the Ontario Ministry of Transportation (MTO) and Ontario Ministry of Tourism, Culture, and Sport (MTCS)'s to develop #CycleON Action Plan 2.0. Created in 1949, OPHA is a member-based, non-partisan, not-for-profit organization that provides leadership on issues affecting the public's health and works to strengthen the impact of people who are active in public and community health throughout Ontario.

Promoting safe cycling has many benefits that are of interest to OPHA and the public health sector. Cycling provides an important way to encourage physical activity as a means to prevent chronic disease, can help improve air quality, reduce dependence on car travel, support social connectedness, develop place-based engagement and improve quality of life for people of all ages.

OPHA is encouraged by the proposed initiatives within Action Plan 2.0 and believes that they will help the Province achieve its goals for cycling in Ontario. OPHA's workgroup members who have expertise in the areas of environmental health and the built environment have reviewed #CycleON Action Plan 2.0 and outlined below their comments, suggestions and recommendations to help further strengthen this action plan. We are pleased by the opportunity to provide feedback, and invite you to review our submission that addresses the various sections of your proposed action plan.

Design Healthy, Active and Prosperous Communities

This section covers major policy implications across the province quite well by ensuring that active transportation is covered in municipal official plans, reflecting prior work by the Ontario Government on the Provincial Policy Statement

(PPS). Language within the PPS and Plan 2.0 should also include complete streets, such that municipalities would also need to include this within their official plans. In addition to ensuring active transportation policies are included in official plans, it would also be of benefit to encourage municipalities to integrate supportive land use policies that would enable uptake of active transportation infrastructure.

In finalizing Action Plan 2.0, we recommend that a health equity perspective be considered. For example, it has been shown that municipal resource allocation (e.g. for parks, green space, recreational facilities) often occurs in the more affluent parts of communities. Active transportation, and specifically cycling infrastructure, are particularly important for those of lower income who are less likely to own or drive a motor vehicle; unfortunately, active transportation infrastructure tends to be less purposeful and developed in lower income neighbourhoods. Cycling infrastructure must also be well connected to public transit and meet the needs of our more vulnerable populations.

The action plan also mentions policy documents related to Northern Ontario as well as for the GTHA. This reference left us wondering if there are any other major provincial policy documents that should be considered and included that could influence cycling and active transportation.

Guidelines are most definitely needed and long overdue regarding e-bikes. The e-bikes guidelines should include the use of other motorized vehicles that travel at reduced speeds, such as scooters, mopeds, and devices that may be used to enhance mobility. As these vehicles often use bike lanes, multi-use paths and sidewalks, whether correctly or incorrectly, there needs to be some clear definitions of what those vehicles are, where they belong and how their appropriate use can be monitored and enforced. Along with these guidelines, there should be an accompanying education campaign with funding to support local implementation as well as enforcement personnel.

Safe Routes to School and School Travel Planning are critical aspects to changing travel behaviour and improving health. The Ontario Ministry of Education recently offered funding for School Travel Planning. To encourage consistent language use, we recommend that the Ministry of Transportation also use the same terminology as is being used by the Ministry of Education. The three year funding from this latter ministry is a valued first step given that making long term change in travel behaviour needs to begin with our children.

There is no doubt that children walking and cycling to school will increase their physical activity. An opportunity to include more mandatory education into the school curriculum would support this desired behaviour change. We would recommend strengthening the language on this topic by using the wording "Collaborate with Ministry of Education to develop policies that ensure that schools have safe walking and cycling facilities within a 1.6 km radius of the school". All streets within that buffer zone should support cycling and walking with child-friendly infrastructure.

Lastly, consider actions that would specifically address cycling for older adults. In Ontario, the number of older adults age 65 and over is projected to almost double from 2.3 million in 2016 to 4.6 million in 2041 (Ontario Ministry of Finance, Ontario Population Projections Update 2016-2041). Older adults would benefit from cycling as it would offer an alternative mode of transportation (especially as many older adults may no longer drive), in addition to the benefits that can be derived from physical activity and social connectivity.

Improve Cycling Infrastructure

Providing safe, high quality, connected cycling infrastructure encourages people to cycle, especially those who would like to cycle more but have been afraid to do so. To encourage greater adoption of cycling as a preferred mode of transportation, the following are needed: consistent wayfinding; all season

maintenance standards (including snow removal) that put the needs of cyclists first as a vulnerable road user; and short and long term bicycle parking.

Support for cycling and walking are included in Ontario's Climate Change Action Plan. By including this point in the Action Plan, we assume that additional resources and funding will be channeled to active transportation at the municipal level as well. The Cycling Infrastructure Fund should remain available for commuting, active living and recreational purposes, as stated in the draft plan. This expanded emphasis makes the funds more accessible, in particular to small, rural communities who may not have the density of commuter cyclists that were required in the first round of this funding.

The provincial cycling network is valuable in helping people connect from one municipality to another. It is important as well for municipalities to be able to take those provincial/inter-municipal connections and link them to their own municipal networks. We recommend that the province continue the Ontario Municipal Cycling Infrastructure Fund. This fund has not only helped to increase the number of kilometers of safe cycling infrastructure, it has also raised the level of awareness and importance paid to cycling infrastructure across Ontario's municipalities.

The Ontario Traffic Manual, Book 18, has been a valuable resource in cycling infrastructure development. Further strengthening the resources within this document will give engineers the structure, yet creativity, to implement innovative cycling infrastructure. As part of the action to "Work with municipalities to update Ontario Traffic manual Book 18: Cycling Facilities", the review should consider best practices for designing cycling facilities that reduce cyclist exposures to air pollution. Public Health is an invested stakeholder in this area and OPHA would value participating in the updating of this resource.

Including cycling infrastructure in provincial highway construction projects will help accelerate implementation of safe and comfortable networks for cyclists. However, more comfortable and low-stress cycling and pedestrian facilities need to be considered when constructing and rehabilitating provincial overpasses, including at on and off ramps. This should be carried out for all provincial highway construction projects, not just along cycling networks. When designing and reconstructing roads, active transportation infrastructure should be considered, as well as differences that may exist between jurisdictions. For example, issues such as how municipalities work with MTO on ramp terminals and ramp exits, as well as crossing 400 series interchanges need to be examined.

Currently, road performance is done through analysis of "level of service" and typically carried out for vehicles. Providing municipalities with guidance on measuring level of service for cyclists would help better assess the trade-offs between different modes of transportation. We recommend that the province investigate potential models (e.g. City of Ottawa) for carrying out this type of analysis in the future.

Make Safer Highways and Streets

Education is undoubtedly part of a larger strategy to improve road safety. Two of the points within this section appear to be the same, "Launch a public education campaign on cyclist rights and responsibilities", and "Work to improve awareness of cycling rules and procedures". We suggest that one of these points include a more targeted approach to education by requiring that all new bikes have point-of-sale information about the rules of the road, rights and responsibilities.

OPHA has valued past collaboration with your ministry on improvements to the Driver's Handbook. From our interviews with driver training Instructors, we learned that many of them are already teaching how to share the road, but we found there were significant variances in what they were teaching and the accuracy

of the information they were providing. Please see <http://www.opho.on.ca/getmedia/eba60408-865a-4402-870d-59f93053e399/Beginner-Driver-Education-Curriculum-Research-Project-Final-Report.aspx> for the full report or contact Jackie.gervais@niagararegion.ca. Now is a critical time to engage new drivers in conversations about everyone's rights on the road. The action plan should look to cover ways that current drivers can be educated about how to safely interact with cyclists. There are many new road designs, pavement markings and types of cycling infrastructure that drivers may be unfamiliar with. Education campaigns need to consider reaching both new and experienced driver audiences.

In addition to the above recommendations for this section, the following statement found in the action plan would benefit from greater clarity; the action plan speaks to "Continue[ing] to reach out to road safety experts". More details surrounding the intent behind this action would be helpful.

Promote Cycling Awareness and Behaviour Shifts

There is a strong need for a certified province-wide cycling education program. Currently there is no standard and a hodgepodge of cycling training programs exists. A reputable provincial cycling instructor training program is needed to ensure that certified instructors are teaching people of all ages how to cycle safely. Presently, many communities have been using the CAN BIKE program. Should this curriculum be part of the province-wide cycling education program, more certified CAN BIKE National Trainers would be needed to teach new cycling instructors. Greater investment in cycling training can help to support the safe riding practices we would like to see people using on the road.

Share the Road Cycling Coalition has been conducting opinion surveys regarding cycling attitudes. Partnering with an agency that already has a strong reputation and experience would be valuable. One area to consider conducting research in is developing a standard for measuring cycling level of service. Understanding what a baseline looks like to support cycling could give municipalities the tools they need to assess their own cycling-friendly supports and infrastructure.

As part of the action "Create Ontario Cycling Coordination Committee", the committee should also be responsible for keeping current with research and best practices and disseminating information to help guide policy. The Committee should be engaged with academia and research like the Cycling in Cities <http://cyclingincities.spph.ubc.ca/> program which investigates factors that encourage or discourage bicycling, transportation infrastructure associated with increased or decreased risks of cycling injuries, and air pollution and cycling. This research program is based at the University of British Columbia's School of Population and Public Health. It has many partners including researchers from Simon Fraser University, Ryerson University, the Universities of Montreal, Toronto and Victoria, cycling planners, and cycling advocates.

Increase Cycling Tourism Opportunities

Undoubtedly, improved cycling infrastructure and the promotion of cycling in Ontario will be of great benefit not only to tourists but to local communities and their residents as well. Providing small incentive grants would help local tourism agencies to promote cycling in their own municipalities as a connection to the larger provincial cycling network and provincial marketing efforts. Annually, there is the Ontario Bike Show in Toronto and Velo in Quebec. These types of shows attract people from all over who are interested in great places to cycle. Offering small incentive grants would allow cycling tourism agencies the opportunity to participate at such shows and create enticing displays.

We appreciate the opportunity to offer our comments on Action Plan 2.0. We would be pleased to further discuss our submission and welcome any questions about the suggestions and recommendations found within it. We look forward to learning more about #CycleON: Action Plan 2.0 as the Province continues to make progress on this important plan which can offer many health benefits to people throughout Ontario.

Thank you for your consideration.



Pegeen Walsh
Executive Director

cc: Kevin Haley, Co-chair, Built Environment Work Group, OPHA
cc: Fabio Cabarcas, Co-chair, Built Environment Work Group, OPHA
cc: Jackie Gervais, Member, Built Environment Work Group, OPHA

About OPHA

Created in 1949, the Ontario Public Health Association (OPHA) is a non-partisan, non-profit organization that brings together a broad spectrum of groups and individuals concerned about people's health. OPHA's members come from various backgrounds and sectors - from the various disciplines in public health, health care, academic, non-profit to the private sector. They are united by OPHA's mission of providing leadership on issues affecting the public's health and strengthening the impact of people, who are active in public and community health throughout Ontario. This mission is achieved through professional development, information and analysis on issues effecting community and public health, access to multidisciplinary networks, advocacy on health public policy and the provision of expertise and consultation.