



January 29, 2013

To Minister Chiarelli and the Ministry of Transportation

The Ontario Society of Physical Activity Promoters in Public Health (OSPAPPH) commend the Minister for updating the 20-year old Ontario Bike Policy, and are encouraged to see your Ministry identify cycling as part of the solution to many of the health, environmental, social and economic challenges facing our province and communities today.

OSPAPPH's mission is to elevate physical activity as a public health priority in Ontario through engagement, education, advocacy and strategic alliances. We aim to be the unified voice representing public health practitioners with the mandate of promoting physical activity in their respective communities. This society builds on the strengths of an established infrastructure and mandate within the public health system, as well as the partnerships formed at the community, provincial and national levels, with the ultimate purpose of increasing physical activity levels in Ontario.

We are excited to have the opportunity to provide input to the draft Cycling Strategy as we know providing opportunities for Ontarians to increase their physical activity is essential to decreasing chronic diseases and conditions such as obesity, and improving the health of our province.

Cycling is an important feature in creating a healthy, active community that will attract and retain residents and businesses. Many initiatives are underway in municipalities across Ontario that will improve infrastructure and safety for cyclists; however, as the draft Cycling Strategy indicates, municipalities and communities cannot do this alone.

We believe that the province, led by the Ministry of Transportation, has the opportunity to set a clear and coordinated strategy that will improve cycling infrastructure and improve safety through education and legislation making cycling a safe, accessible, convenient choice for both transportation and recreation in Ontario. Outlined in the attached document are our recommendations for strengthening the draft Cycling Strategy (Appendix).

Regards,

Chalonde

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Appendix

OSPAPPH Recommendations for Strengthening draft Cycling Strategy

Section 1 – Context

We agree that there are multiple benefits of cycling and recognize that there are efforts among several ministries to encourage and support cycling in Ontario. We are pleased that the Ministry of Transportation has already undertaken several actions and that cycling is identified as a significant piece of MTO’s sustainability framework.

Recommendations:

1. The design and development of transportation infrastructure is closely linked with land use planning. Therefore, the Strategy needs to clearly link to, and be supported by, policy in other provincial planning initiatives; specifically the Provincial Policy Statement, the Growth Plan for the Greater Golden Horseshoe and the Growth Plan for Northern Ontario.
2. On page 5 of the strategy it states that “under the Ontario Public Health Standards (OPHS), Public Health Units are required to deliver initiatives and programs related to healthy weights, physical activity and prevention of injuries.” This does not accurately reflect the scope of work within public health and we would suggest changing the wording to be: “The OPHS require Public Health Units to work with a variety of partners (e.g., municipalities, workplaces, school boards) to support healthy public policies and the creation or enhancement of supportive environments and to *increase the capacity* of community partners to coordinate and develop programs and services related to healthy weights and physical activity.

Section 2 – A Cycling Strategy for Ontario’s Ministry of Transportation Enhancing Cycling Infrastructure in the Province

We support a focus on enhancing cycling infrastructure and acknowledge that this is a shared responsibility between provincial and municipal governments.

Sixty (60%) percent of Ontarians say they would like to cycle more often, and that the main reason they don’t is that they are worried about safety on the road.¹

¹ Share the Road Cycling Coalition (2010) Green Paper for an Ontario Bicycling Policy: When Ontario Bikes, Ontario Benefits.

In more urban, sub-urban areas, we encourage the strategy to include a Complete Streets approach. A Complete Street is one that is designed for all ages and modes of travel and provides safe and comfortable access for pedestrians, bicycles, transit users and the mobility-impaired.²

Rural communities across the province face particular challenges when it comes to making infrastructure improvements. Conditions differ from urban areas, such as a high proportion of two-lane roads, higher traffic speed and volume of large trucks. Large geography means extensive road networks to maintain, but a lower tax base to support costs. Enhancing roads to accommodate cycling adds expense to roads budgets that are already stretched to the limit. Rural considerations may necessitate different strategies and solutions than urban areas.

Recommendations:

3. The Strategy needs to more clearly articulate a long-term strategy for and commitment to developing a connected provincial cycling network. For provincial highways, this means:
 - including paved shoulders wherever possible in new construction, reconstruction, and overlay projects
 - independently adding paved shoulders to existing roadways where sufficient need has been identified
4. The province needs to dedicate funding for cycling infrastructure projects on its highways and highway crossings, and create an ongoing cycling infrastructure fund for municipalities to access. The Ministry of Transportation and the Ministry of Health and Long-Term Care (Healthy Communities funding) could work collaboratively to provide long-term sustainable funding that could be utilized for infrastructure initiatives as well as the development of policies and programming. If the scope of the funding was broader, it would allow initiatives to move forward and have greater, long-term impact in our communities.
5. As we move towards developing communities that are designed around people, not just cars, an increased investment in active transportation is required. The Ministry needs to imbed in the strategy that provision for cyclists and pedestrians will be included in all new projects. This should not be dependent on Municipal request, but be an inherent part of the project. This is consistent with the Complete Streets recommendation in the Coroner's Review.

² Complete Streets. <http://completestreetsforcanada.ca/what-are-complete-streets>

6. The strategy currently prioritizes linkages between existing cycling routes, but could be strengthened by including a plan to explore development of cycling infrastructure where there are currently no routes; particularly in communities where infrastructure development is sparse.
7. The criteria for evaluating priority projects on a case-by-case basis needs to be revised to be more clear. Presently the list is vague, and open to subjective interpretation. The strategy needs to advocate for the inclusion of cyclists at all stages of project development and should be a key criteria of priority projects as this is critical to improving the safety of cyclists and increasing the number of Ontarians who would be willing to cycle if it was safe to do so.
8. The Strategy should speak to the use of Ministry of Transportation right-of-ways for cycling infrastructure where appropriate.

Enhancing Cycling Safety through Education and Legislation

We agree that safety on roads in Ontario is a shared responsibility. Increasing cycling activity requires both better infrastructure and skills training for cyclists and motorists.

As the draft Strategy notes, all cyclists are legitimate road users, and have similar rights and responsibilities as other vehicles. As more people choose to ride bikes for recreation and transportation, it becomes more important for all road users to have the knowledge and skills to be able to share the road safely.

There is opportunity to reach and educate the next generation of drivers, in order to begin to shift the cultural view that roads are only for cars. New drivers need to receive up-to-date information on sharing the road with cyclists in driver education resources. We are pleased to know that the Ministry is in the process of updating the Driver's Handbook in this regard. The Beginning Driver Education curriculum needs to be reviewed in a similar way, to ensure that all new drivers in Ontario get consistent and accurate information.

The Coroner's Review of Cycling Deaths made recommendations for changes to provincial legislation. Changes to the Highway Traffic Act can enhance safety by providing clear guidelines about motorist and cyclist behavior on roads. Legislation also provides the police with ways to enforce unsafe road interactions.

Recommendations:

In addition to existing public education initiatives, the Ministry should also include in the Strategy:

9. Ways to address cycling education for children, youth and other new cyclists. We recommend that the Ministry of Transportation work with the Ministry of Education to build mandatory cycling safety education into the curriculum, including on-road skills training.
10. Commitment to review and update the Beginner Driver Education curriculum for information about sharing the road with cyclists
11. Commitment to annual investment in a provincial Share the Road education campaign.
12. Changes to legislation to create a safer cycling environment, namely:
 - creating a one metre passing law
 - greater clarity about where cyclists can and should be riding when on roads
 - mandatory helmet requirement for all cyclists
13. The need to work closely with provincial and local law enforcement authorities regarding the enforcement of existing legislation.
14. Commitment to review the section of the Highway Traffic Act that currently restricts driving on paved shoulders.

Ensuring Relevancy through Monitoring, Researching and Coordinating

Municipalities and other stakeholders are looking at the Ministry to provide leadership, coordination and ongoing evaluation in order to maximize strengths and seize opportunities to make Ontario a bicycle-friendly destination and province.

Recommendations:

15. The Strategy should make it a priority to create a cycling specific position within the Ministry. This person would be the point of contact for other Ministries as well as external stakeholders, have decision-making authority, and would guide and coordinate the implementation of the Cycling Strategy.
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16. The Strategy speaks to the need for coordination. It would be strengthened by better articulation of the need to engage stakeholders, who these include, and how this could happen. We recommend the following external interests be identified: public health, planning, tourism, recreation, economic development, cycling advocacy, law enforcement, municipalities, health care and education.
 17. The Strategy should speak more explicitly about the Ministry's role in initiating research aimed at improving knowledge related to cycling in Ontario. These include issues related to e-bikes, establishing a system for measurement of cycling activity, and evaluating the economic potential for cycling in Ontario. Coordination of research through academic institutions is another viable option.
 18. The Ministry of Transportation should improve communication with stakeholders and the public about research, resulting data, and initiatives currently underway that support cycling in the province.
 19. The Ministry should work with municipalities and public health units to develop clear indicators for the type of data to be collected so that it is done consistently, is comparable across the province, and can be utilized to monitor the strategy over time.
 20. MTO needs to establish a regular and scheduled review period (e.g. every 5 years) for the new Cycling Strategy.
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