



**Complete  
Streets**

**tcat** toronto centre for  
active transportation 



May 1, 2014

Glenn Murray, Minister  
Ministry of Transportation  
Safety Policy and Education Branch  
1201 Wilson Avenue, Building "A", Room 212  
Downsview, ON, M3M 1J8

***Re: Road Safety Proposals to Reduce Distracted Driving and Impaired Driving,  
and to Improve Cyclist Safety, in Ontario***

Dear Minister Murray,

I am writing to you on behalf of the Toronto Centre for Active Transportation (TCAT), a project of the registered charity Clean Air Partnership. TCAT's mission is to advance knowledge and evidence to build support for safe and inclusive streets for walking and cycling. Over the past year, TCAT has been pleased to participate in the Cycling Strategy Working Group formed to provide advice and direction on cycling policy changes.

I am writing to express TCAT's support for Bill 173, Highway Traffic Amendment Act (Keeping Ontario's Roads Safe), 2014 which includes several changes that will improve the safety of Ontario's most vulnerable road users - cyclists and pedestrians. In particular, we support the following:

- Require drivers to maintain a one-metre distance when passing a cyclist (Section 148);
- Increase fines and assigning demerit points for distracted driving (Section 78);
- Allow for contraflow bicycle lanes on one-way streets (Section 153);
- Allow for traffic control signals specific to bicycles (Section 144);
- Increase fines and demerit points for drivers that open vehicle doors in the path of cyclists (Section 165);
- Require drivers to remain stopped at a pedestrian crosswalk or school crossing until the pedestrian is completely off the roadway (Sections 140 and 176); and
- Permit bicycles to be ridden or operated on the paved shoulder of a highway that is divided into two separate highways (Section 37).

However, we recommend the following two changes:

- The requirement for red reflective material covering a surface of not less than 250 millimetres in length and 25 millimetres in width for the rear of the bicycle. Many bicycles do not physically have the length or width to install reflectors of this size. We recommend that the phrase "covering a surface of not less than 250

millimetres in length and 25 millimetres in width” be removed from this Section of the Act. (Section 62);

- The proposed increase in fines for lights and reflectors on bicycles from \$20 to \$60 is reasonable, and puts it more in line with the other fines for bicycles under the HTA. However, the maximum of \$500 represents an increase of 2400% that is disproportionate to the offence and is a much greater increase than more serious offences such as dooring. We recommend that a set fine be set at \$60 and the upper range be eliminated.

We would like to thank you for the opportunity to comment. The changes proposed under Bill 173 have been strongly encouraged by a cycling advocates and other stakeholders dating back nearly 20 years ago when, in 1998, the Regional Coroner for Toronto released his report titled “A report on cycling fatalities in Toronto 1986-1998” “Recommendations for reducing cycling injuries and death”  
[http://www.toronto.ca/cycling/reports/coroner/coroner\\_appendix.htm#amendments](http://www.toronto.ca/cycling/reports/coroner/coroner_appendix.htm#amendments).

Thus, without further delay, we strongly urge the commitment of all parties in the legislature to move forward with Bill 173 to increase the safety of the roads in our province and to reduce traffic injuries and fatalities, especially for our most vulnerable road users.

Sincerely,



Nancy Smith Lea  
Director,  
Toronto Centre for Active Transportation  
Clean Air Partnership