

## **Comments Submitted by OPHA in Response to the Ministry of Transportation's Online Questionnaire Concerning Speed Limits on Urban Roads\***

Research has indicated that more than 100,000 people are killed in traffic accidents around the world every month and that every day 750 people walking are killed by cars. OPHA believes this situation is critical, urgent and can be avoided. With the right leadership and policies, slower speeds can save lives.

OPHA would argue for a blend of the ministry's proposed Options #2 and #4, with Option #2 requiring the setting of minimum standards across the province (i.e. 40km/h) and the addition of Option #4 (i.e. allowing municipalities to adopt lower speed limits according to their context). It would also give municipalities the option to adopt higher speed limits when considered necessary.

As stated earlier, Option #2 is important because:

- Provincial wide policies can help overcome the challenges of coordination and local decision making. They can also prevent this important issue from becoming the subject of local political battles. Already Ontario's leadership in areas such as land use planning (e.g. Provincial Policy Statement) and the CycleON# cycling strategy has been helpful for providing leadership direction on key issues that otherwise could be difficult to decide locally.
- Consistent province-wide speed limits can promote driver awareness and ease enforcement between municipalities. This has been identified by the City Council of Victoria, BC's (2013) request to the BC Federation of Municipalities to advocate for provincial change in British Columbia (see: City of Victoria Council (2013). Reducing Default Speed Limits for Municipal Roads (2013). Council Meeting January 17, 2013. Retrieved from <https://victoria.civicweb.net/Documents/DocumentDisplay.aspx?ID=46208>)
- Consistency in speed limits can also facilitate the standardization of road design standards and guidelines. Road design and physical changes to roads are likely to be among the most effective traffic reduction strategies (see for instance TAC, CITE. (1998) Canadian guide to neighbourhood traffic calming. Transportation Association of Canada and Canadian Institute of Transportation Engineers or Institute of Transportation Engineers -- ITE. (1999). Traffic Calming: State of the Practice).

OPHA would argue against Option #1 since it does not address the issue of safety and reducing injuries and against Option #3 for the following reasons:

- A path dependency (policy inertia based on preceding traditions) can be generated because municipalities would require a higher effort and resources to coordinate speed limits across jurisdictions. An example is the higher enforcement cost (e.g. photo radars, police services) that leading municipalities would likely require when adopting approaches that are not standard in neighbouring jurisdictions. In addition, this would make keeping existing speed limits the easier choice in most cases.

- In neighbouring urban and suburban areas (such as in the GTA) in which there are multiple arterial and local roads across several municipalities, roads characteristics tend to be similar across boundaries. The inconsistency of environments can lead to confusion for drivers that would be difficult to overcome with just signaling. It also would be very difficult to post signs at each entry point as suggested. This may become a safety concern; it would also make the default range of speed limits municipalities work with consistent with the Transportation Association of Canada - TAC. (2009) Canadian Guidelines for Establishing Posted Speed Limits, which currently consider a range of speeds of 40km/h and above.

In conclusion, while lowering the speed limit and posting signs are important, these measures are only part of the solution. Education and raising awareness about the benefits of lower speeds will be critical to ensuring the successful implementation of these changes. Given its provincial mandate of injury prevention, public health is well positioned to assist.

*\*Submitted February 27, 2015 based on comments from members of OPHA's Built Environment Workgroup*