

Applying Universal Law of Location as a Transportation Planning Decision Tool: Ontario Government Data and Evidence Fail to Support Positions on Gridlock, Congestion, and Removal of Bike Lanes

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A. Background

In August, 2024, the Information Research Board (IRB) published [Universal Law of Location Supported by GIS as a Best Practice Element in Land Use Planning and Transportation Planning Decision Systems](#).

Part of the Universal Law of Location research design includes using case studies to test the Universal Law of Location as a land use planning and transportation planning decision tool.

Testing began in the land use planning domain, and in November 2024 IRB published [Universal Law of Location as a Land Use Planning Decision Tool: Analysis of Ottawa Mayor's Pledge to Plant 1,000,000 Trees](#) as the first test of the Universal Law of Location which states that something is everywhere under, on, and above the Earth's surface.

The second case study is in the transportation planning domain, and focuses on gridlock, congestion, and bike lanes, three topics that are discussed in [Universal Law of Location Supported by GIS as a Best Practice Element in Land Use Planning and Transportation Planning Decision Systems](#).

This case study is at the provincial level, and the subject topics are receiving large amounts of broadcast media and social media attention, partly because Premier Doug Ford is heavily involved as is Transportation Minister Prabmeet Sarkaria.

The procedure selected to evaluate the robustness of the Universal Law of Location is early in the pilot study phase. Therefore, this is one of a battery of tests used to explore the robustness of the procedure, and the utility of the Universal Law of Location as a best practice element in land use planning and transportation planning decision systems.

For research opportunity reasons, the first test case was in the domain of land use planning. **(1)**

Research design and subject matter balance reasons called for a shift to the transportation planning domain for the second case study. And, intensity of public interest, as well as controversy about political ideology directing government legislation led to the decision to investigate provincial government statements about gridlock, congestion, and removal of bike lanes in urban centers.

B. Case Study Objective

This case study continues the process of testing the Universal Law of Location as a land use planning and transportation planning decision tool. ([Universal Law of Location](#))

[Supported by GIS as a Best Practice Element in Land Use Planning and Transportation Planning Decision Systems](#)

The first test case was in the land use planning domain and involved the 2022 municipal campaign pledge of mayoral candidate Mark Sutcliffe and now-mayor Mark Sutcliffe, City of Ottawa, to achieve 1,000,000 tree plantings in the current term of office, 2022-2026. ([Universal Law of Location as a Land Use Planning Decision Tool: Analysis of Ottawa Mayor's Pledge to Plant 1,000,000 Trees](#))

For the second case study the objective is to use the Universal Law of Location as a tool to ascertain whether, how, and with what consequences the provincial government takes geographic considerations into account in statements and decisions involving gridlock, congestion, and the removal of bike lanes in cities in Ontario.

The research design of the second case study follows that of the first case study. That is, the criterion of utility with its focus on “practical use” was selected for the first test to assess the value of the Universal Law of Location as a land use planning decision tool. Synonyms of the concept of utility include accountability, applicability, benefit, effectiveness, efficiency, functionality, pertinence, practicality, relevance, suitability, use, and usefulness.

The fundamental point in choosing this route is that if the Universal Law of Location satisfies the utility condition, as well as many of the synonyms of utility, then the Law is likely to be of value to transportation planners, municipal politicians, and citizens.

And, conversely, if the Universal Law of Location is not found to satisfy the utility condition, and many of the synonyms of utility, then the Law is not likely to be of value to transportation planners, municipal politicians, or citizens.

The general finding from the first case study is that the Universal Law of Location demonstrated its utility as a land use planning tool by its contributions to the two measures of success:

- A. Enhancing data and evidence for data-driven and evidence-based decisions about where to locate trees and how to monitor tree-planting activities.
- B. Proposing terms of reference for data-driven or evidence-based studies to support decisions about where to locate trees and how to monitor tree-planting activities.

Given the success of the first test, the second test follows suit with necessary language changes from land use planning to transportation planning. The focus of language in this case study is on gridlock, congestion, and bike lanes.

Following from the discussion in [Universal Law of Location Supported by GIS as a Best Practice Element in Land Use Planning and Transportation Planning Decision Systems](#), the test for assessing the utility of the Universal Law of Location as a transportation planning and decision tool is whether:

1. It contributes to enhancing data and evidence about the occurrence of gridlock situations, and the location-related conditions susceptible to the occurrence of gridlock events.
2. It contributes terms of reference for data-driven and evidence-based studies to support decisions about location-related actions to rectify gridlock situations.
3. It contributes to enhancing data and evidence about the occurrence of congestion situations, and the location-related conditions susceptible to the occurrence of congestion events.
4. It contributes terms of reference for data-driven and evidence-based studies to support decisions about location-related actions to rectify congestion situations.
5. It contributes to enhancing data and evidence about location-related reasons for bike lanes to be a cause of motorized vehicle congestion, and location-related reasons for the removal of bike lanes to be a solution to motorized vehicle congestion.
6. It contributes terms of reference for data-driven and evidence-based studies to support decisions based on location-related reasons to remove bike lanes for being a cause of motorized vehicle congestion.

Discussions about data, evidence, and terms of reference for studies are presented in sections D, E, and F for gridlock, congestion, and removal of bike lanes, respectively.

Before proceeding to those discussions, however, it is necessary to present context materials including reference documents in section C, so that the reader is apprised of some of the history and some of the communications which led to combining gridlock, congestion, and removal of bike lanes in this report.

With those background and context materials in place, section G assesses the utility of the Universal Law of Location as a transportation planning decision tool regarding the two test elements for each of gridlock, congestion, and removal of bike lanes.

C. Communications and Selected Reference Documents Providing Context for Sections D, E, F, G, and H

Exhibits 1 and 2 are email communications sent to Transportation Minister Prabmeet Sarkaria and Premier Doug Ford requesting the names and email addresses of the officials who advised them on the content of legislation and their public statements regarding gridlock, congestion, and removal of bike lanes.

That route was chosen based on my experience as a former senior policy advisor, Government of Canada, and experiences from numerous consulting and research tasks. Namely, that few ministers, premiers, or prime ministers have the expertise borne of education, training, and hands-on practice to prepare data-driven or evidence-based legislation, or to speak knowledgeably about matters involving research methodology.

As a result, it is deemed advisable to speak directly to officials who are responsible for informing politicians about the methodology underlying the advice given on policy, program, planning, and operations matters. **(2)**

In addition to requesting names and email addresses of officials responsible for the content of Government of Ontario announcements involving two road projects in the Ottawa area which are attributed to gridlock, questions also arise concerning the use of the term gridlock in the title of Bill 212.

Examination of the text of Bill 212 Reducing Gridlock, Saving You Time Act, 2024 reveals the preamble statement.

The Government of Ontario:

Recognizes the need to build priority highways faster as our province grows in order to get people and goods out of gridlock and save drivers and businesses time and money.

Recognizes that accidents and lane closures can worsen traffic congestion and impact the quality of life of Ontarians.”

[\(Bill 212 - Reducing Gridlock, Saving You Time Act, 2024\)](#)

However, searches of the documentation regarding Bill 212 did not yield a definition of “gridlock” or any bodies of data or evidence establishing the chronic or even incidental occurrence of actual gridlock events or processes, which heightens the need to question officials about the data and evidence used to justify Bill 212 Reducing Gridlock, Saving You Time Act, 2024.

Exhibit 1. Email to Prabmeet Sarkaria, Minister of Transportation, re: Advisors to MTO Minister on gridlock, congestion, removal of bike lanes

From: wellar.barry@gmail.com <wellar.barry@gmail.com>
Sent: Tuesday, November 12, 2024, 8:08 PM
To: Prabmeet.Sarkaria@pc.ola.org
Cc: George A. Neville <george.neville@ncf.ca>; 'doug arnold' <douglasarnold@sympatico.ca>; 'le hibou' <ottawaowl2@yahoo.ca>; wellar.barry@gmail.com; 'Horizon Ottawa' <info@horizonottawa.ca>; information@fca-fac.ca
Subject: Advisors to MTO Minister on gridlock, congestion, removal of bike lanes.

Honourable Prabmeet Sarkaria, Minister
Ontario Ministry of Transportation

Dear Minister Sarkaria,

The purpose of this communication is to request that you provide the names and email addresses of the officials who advise you on the following three matters:

- Gridlock
- Congestion
- Removal of bike lanes

In the way of a heads up which might serve to expedite identifying the person(s) of interest, repeated searches of MTO's digital holdings have not enabled me to identify the specific documents which are the source(s) of MTO's position on, or your public comments about gridlock, congestion, or removal of bike lanes.

As a result, I am obliged to ask you directly for the names and email addresses of the person(s) who advise you on these three matters so that I can ask them about the productions underlying the advice they provide you as the basis of your position and statements in those regards.

I look forward to receiving your reply at the earliest moment.

Dr. Barry Wellar, C.M.
Professor Emeritus, University of Ottawa
President, Information Research Board, (IRB) Inc.
133 Ridgefield Crescent
Nepean, ON K2H 6T4
<https://wellar.ca/informationresearch/>

Exhibit 2. Email to Premier Doug Ford re: Advisors to MTO Minister on gridlock, congestion, removal of bike lanes

From: wellar.barry@gmail.com <wellar.barry@gmail.com>

Sent: Tuesday, November 12, 2024, 8:18 PM

To: 'Premier of Ontario | Premier ministre de l'Ontario' <Premier@ontario.ca>

Cc: George A. Neville <george.neville@ncf.ca>; 'doug arnold'

<douglasarnold@sympatico.ca>; 'le hibou' <ottawaowl2@yahoo.ca>;

wellar.barry@gmail.com; 'Horizon Ottawa' <info@horizonottawa.ca>; information@fca-fac.ca

Subject: Advisors to Premier Doug Ford on gridlock, congestion, removal of bike lanes.

Honourable Doug Ford, Premier
Province of Ontario

Dear Premier Ford,

The purpose of this communication is to request that you provide the names and email addresses of the officials who advise you on the following three matters:

- Gridlock
- Congestion
- Removal of bike lanes

In the way of a heads up which might serve to expedite identifying the person(s) of interest, repeated searches of MTO's digital holdings have not enabled me to identify the specific documents which are the source(s) of MTO's position on or your public comments about gridlock, congestion, or the removal of bike lanes.

As a result, I am obliged to ask you directly for the names and email addresses of the person(s) who advise you on these three matters so that I can ask them about the productions underlying the advice they provide you as the basis of your position and statements in those regards.

I look forward to receiving your reply at the earliest moment.

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No replies to the letters of November 13 asking about officials were received from Premier Ford or Minister Sarkaria prior to the production schedule due date of December 13 for accepting replies.

It had been expected from experience, however, that the politicians would respond by offloading the questions to those with substantive expertise. As a result, an opinion piece was prepared to promote discourse with government officials, and with academics, community activists, municipal and provincial politicians, and other interested parties with pro and con views on the Ontario government positions regarding gridlock, congestion, and bike lane removals.

The opinion was submitted to the Ottawa Citizen on November 5 and received a positive response for publication in the e-version. While awaiting publication, it was disseminated among interested parties in Canada and abroad, and it was “pencilled in” to the draft report.

Regrettably the opinion was not published by the Ottawa Citizen as of December 9, so it was decided to forego the broadcast media venue due to time already lost and publish the opinion via one or more social media sites to get the opinion “out there”. (3)

One link to the op-ed is posted on social media, <https://tinyurl.com/mryzw2ez>, and the full text is shown as Exhibit 3 in this report for the convenience of readers.

Exhibit 3. “Gridlock, Congestion, and Bike Lanes: Zero for Three at MoT”. Op-ed submitted November 5, 2024, to the Ottawa Citizen, not published, re-directed to social media December 9, 2024

Gridlock, Congestion, and Bike Lanes: Zero for Three at MoT

Premier Doug Ford is receiving terrible advice on the urban transportation file and, regrettably, he is making a massive blunder if he acts on advice which led him to erroneously believe that removing bike lanes is a fix for cities which media reports portray in a state of near paralysis because of so-called gridlock and motor vehicle traffic congestion.

Moreover, if Minister of Transportation Prabmeet Sarkaria and MoT staff are behind Premier Ford’s false impressions about gridlock and congestion, and about removing bike lanes to fix those two seemingly egregious problems, then that agency needs a housecleaning just as was done with Steve Clark and Municipal Affairs due to the Greenbelt scandal.

Three matters are at issue.

First, the term “gridlock” requires a grid of connected streets, so if there is no grid consisting of multiple streets and blocks there cannot be gridlock, it is just an everyday traffic jam.

The few genuine cases of gridlock from around the world over the past four decades involve a street grid of 40-60 blocks and associated streets, and the streets are so clogged with vehicles that all the intersections are totally compromised within the gridlocked zone, so that no vehicles can enter or leave.

That is the true nature of actual gridlock, and numerous requests to many jurisdictions over many years have not yielded evidence of even one case of genuine gridlock in Ontario, or in Canada.

Could I be wrong about gridlock in Ontario? Sure, if Minister Sarkaria and MoT experts have videos to prove their case. Without that hard evidence, references to gridlock by Minister Sarkaria and MoT should be seen as a scare tactic using sensational language to get money for road-building projects.

Second, “urban traffic congestion” is a natural phenomenon that has occurred in urban regions around the world for more than a century.

Levels of congestion differ only by degree from minor to saturated. The difference in vehicular traffic congestion levels depends on the share of trips made by each mode of travel, that is, private motor vehicle, transit, cycling, and walking.

Intelligent people learn early on that reducing trips by private motor vehicle is the most effective and efficient way to lower traffic congestion levels.

Again, Minister Sarkaria and MoT experts, do you have evidence of even one metropolis in the world that has built its way out of severe congestion long term by adding capacity to move private motor vehicles? If so, show us the evidence.

Plain and simple, one truth from urban traffic lessons over the past 75 years and counting is that vehicle congestion from miserable to saturation levels will occur wherever private motor vehicles are the dominant mode of urban transport.

Finally, progressive cities began adopting sustainable transport principles and practices two to five or more decades ago.

A feature common to all those cities is bike lanes, and the evidence is overwhelming that the more lanes which are built the more bikes are used, the less private motor vehicles are used, and the more traffic congestion levels are reduced.

Clearly, it is way past time for MoT to stop wasting scarce urban land and taxpayer dollars building roads that are doomed to fail and do what is best for the people of Ontario: be a leader in the shift from private motor vehicles to transit, cycling, and walking.

**Barry Wellar, Professor Emeritus, University of Ottawa, President,
Information Research Board**

<http://wellar.ca/informationresearch/Publications.html>

The Ford government's statements about gridlock, congestion, and bike lanes have dominated public discourse, and the purpose of the op-ed was to bring balance to the discussion by challenging statements which have been likened to hallucinations.

Due to research scheduling reasons, it was decided to forego further waiting for the op-ed to be published in the Ottawa Citizen. This way the op-ed is available before completing the report, which means that it can be sent to officials if any are named, disseminated to other researchers, and sent to interested parties such as journalists and public interest groups.

Exhibit 4. Radio advertisement re Ontario government expenditures for upgrades to Road 174 in east Ottawa, and to Barnsdale Road crossing Highway 416 in south Ottawa due to "gridlock"

On a number of occasions in October I heard a radio announcement in which it was stated that the Government of Ontario would expend funds on upgrades to Road 174 in east Ottawa, and on Barnsdale Road at Highway 416 in south Ottawa due to "gridlock". The radio announcements were confirmed by other researchers, although web searches did not yield a source from whom the full text could be obtained. **(4)**

Emails were sent to Ottawa-area MPPs and Ottawa councillors asking about the announcement, but with emphasis on evidence about gridlock-related incidents in their ridings and wards, respectively.

MPPs Lisa MacLeod, Stephen Blais, Lucille Collard, Joel Harden, and Chandra Pasma were contacted. The email to MacLeod who is a government member is used for illustrative purposes for the Barnsdale and 401 gridlock story.

Exhibit 5. Email to MPP Lisa MacLeod (Nepean) re Evidence of "Gridlock" as a Cause for Road Modifications Where Barnsdale Road Crosses Highway 416

From: wellar.barry@gmail.com <wellar.barry@gmail.com>

Sent: Monday, November 18, 2024 8:02 PM

To: lisa.macleodco@pc.ola.org

Cc: George A. Neville <george.neville@ncf.ca>; 'doug arnold' <douglasarnold@sympatico.ca>; 'le hibou' <ottawaowl2@yahoo.ca>; 'Horizon Ottawa' <info@horizonottawa.ca>; information@fca-fac.ca; wellar.barry@gmail.com; Prabmeet.Sarkaria@pc.ola.org; 'Chandra Pasma' <chandra.pasma@ontariondp.ca>; ahazell.mpp.co@liberal.ola.org; 'Joel Harden, MPP' <joel@joelharden.ca>; jfrench-qp@ndp.on.ca

Subject: Evidence of "gridlock" as a cause for road modifications where Barnsdale Road crosses Highway 416.

Dear MPP Lisa MacLeod,

Radio announcements sponsored by the Government of Ontario claim that "gridlock" is one of the reasons to justify road modifications at Barnsdale Road and Highway 416.

I know that area very well, and to the best of my knowledge there is not the remotest possibility of gridlock occurring in that vicinity for decades for the basic reason that there is no grid of roads to be locked, just two roadways, 416 and Barnsdale, and there is no significant grid of roads for numerous kilometres in all directions.

I would therefore be most appreciative if you would provide me at the earliest moment the name and email address of the person who authorized use of the term "gridlock" in this context.

And I would be even more appreciative if you would obtain for me an official explanation as to the reason(s) for using the term "gridlock" in this location when there are only two crossing roadways and no grid of roadways in any direction for numerous kilometres.

I look forward to receiving the requested information at the earliest moment.

Thank you,

Dr. Barry Wellar, C.M.
Professor Emeritus, University of Ottawa
President, Information Research Board, (IRB) Inc.
133 Ridgefield Crescent
Nepean, ON K2H 6T4
<https://wellar.ca/informationresearch/>

After four weeks none of the MPPs – Lisa MacLeod (PC), Stephen Blais (Lib.), Lucille Collard (Lib.), Joel Harden (NDP), or Chandra Pasma (NDP) – had replied to the email, even though they are all complicit in the passing of Bill 212, Reducing Gridlock, Saving You Time Act, 2024.

While waiting for one or more MPPs to reply, the decision was made to write to MTO Minister Sarkaria, copied to media people. The reasonable expectation is that transparency and accountability obligations would ensure a prompt and complete reply to my email communication.

Exhibit 6. Email to MTO Minister Prabmeet Sarkaria, Government-sponsored radio broadcast aired in the Ottawa area in September and/or October and/or November 2024

From: wellar.barry@gmail.com <wellar.barry@gmail.com>
Sent: Saturday, December 7, 2024 3:04 PM
To: Prabmeet.Sarkaria@pc.ola.org
Cc: 'George A. Neville' <george.neville@ncf.ca>; 'douglasarnold douglasarnold' <douglasarnold@sympatico.ca>; 'craig macaulay' <lvcrental@gmail.com>; 'Martil Stiles' <MStiles-QP@ndp.on.ca>; lisa.macleodco@pc.ola.org; 'Chandra Pasma' <chandra.pasma@ontariondp.ca>; 'Joel Harden, MPP' <joel@joelharden.ca>; sblais.mpp.co@liberal.ola.org; MTO.media@ontario.ca.; wellar.barry@gmail.com
Subject: RE: Government-sponsored radio broadcast aired in the Ottawa area in September and/or October and/or November 2024

Dear Minister Sarkaria,

Please arrange for officials to provide the text and details of a government-sponsored radio broadcast aired in the Ottawa area in September and/or October and/or November 2024 announcing that due to gridlock issues the Government of Ontario is providing funds for Highway 174 in east Ottawa and the Highway 416 and Barnstable Road interchange area in south Ottawa.

I look forward to receiving this material via email at the earliest moment.

Thank you.

Sincerely

Dr. Barry Wellar, C.M.
Professor Emeritus, University of Ottawa
President, Information Research Board, (IRB) Inc.
133 Ridgfield Crescent

Nepean, ON K2H 6T4

<https://wellar.ca/informationresearch/>

In that same timeframe emails were sent to Ottawa councillors Dudas, Kitts, Luloff, Plante, and Tierney with questions about “gridlock” issues in their wards that could be associated with Road 174, and to councillors Brown, Darouze, Desroches, Hill, and Lo with questions about “gridlock” issues in their wards that could be associated with Barnsdale Road at 416.

The emails to Tierney for Road 194 and Brown for Barnsdale and 416 are used for illustrative purposes.

Exhibit 7. Email to Councillor Tim Tierney re Claim of "gridlock" by Government of Ontario to justify expenditures on Road 174

From: wellar.barry@gmail.com <wellar.barry@gmail.com>

Sent: Tuesday, November 19, 2024, 5:00 PM

To: 'Tim Tierney ' <Tim.Tierney@ottawa.ca>

Subject: Claim of "gridlock" by Government of Ontario to justify expenditures on Road 174

Dear Councillor Tierney,

Radio announcements sponsored by the Government of Ontario claim that “gridlock” is one of the reasons to justify Road 174 expenditures.

I know that area very well, and to the best of my knowledge there is not the remotest possibility of gridlock occurring in that vicinity for decades for the basic reason that there is no grid of roads to be locked, just roadways with numerous opportunities to “escape” Road 174 throughout its length.

Moreover, I am unable to identify a significant grid of roads on either side of 174, much less imagine a merging of grids on each side of 174 whereby they combine to lock traffic on 174 as part of a larger grid, if that is the basis of the announcement.

However, I am not patrolling 174 24/7, so I am reaching out to councillors whose wards are proximal to 174 to ask if any incidence of so-called “gridlock” has been brought to their attention by citizens, city staff, provincial officials, or other parties.

Please inform me if that has happened to you, and the details of the claim, with emphasis on the evidence provided to establish the incidence of “gridlock”.

Kind regards.

Dr. Barry Wellar, C.M.
Professor Emeritus, University of Ottawa
President, Information Research Board, (IRB) Inc.
133 Ridgefield Crescent
Nepean, ON K2H 6T4
<https://wellar.ca/informationresearch/>

Councillors Dudas, Kitts, Plante, and Tierney did not respond to questions regarding Road 174.

Councillor Luloff provided a substantive reply. He had no contact with any provincial official regarding the claim that gridlock is justification for the funding decision, and no communications from ward residents about gridlock.

As reported in exhibit 9 which contains the MTO radio ad, the upgrades to Road 174 appear to be due to congestion in general and gridlock is not specifically mentioned but, that said, no Ottawa councillor in Ottawa east seems to have had a role in deciding where whatever upgrades are to occur to deal with wherever the provincially-identified traffic problems such as congestion originate and/or materialize along Road 174.

Exhibit 8. Email to Councillor David Brown re Evidence of "gridlock" as a cause for road modifications where Barnsdale Road crosses Highway 416

From: wellar.barry@gmail.com <wellar.barry@gmail.com>
Sent: Tuesday, November 19, 2024, 7:36 PM
To: david.brown@Ottawa.ca
Cc: 'doug arnold' <douglasarnold@sympatico.ca>; George A. Neville <george.neville@ncf.ca>; wellar.barry@gmail.com
Subject: Evidence of "gridlock" as a cause for road modifications at Barnsdale Road and Highway 416.

Dear Councillor Brown,

Radio announcements sponsored by the Government of Ontario claim that "gridlock" is one of the reasons to justify road modifications at Barnsdale Road and Highway 416.

I know that area very well, and to the best of my knowledge there is not the remotest possibility of actual gridlock occurring in that vicinity now or for decades for the basic reason that there is no grid of roads to be locked, just two roadways, 416 and Barnsdale, and there is no significant grid of roads for numerous kilometres in all directions.

Moreover, I am unable to identify a significant grid of roads anywhere near Barnsdale and 416 that could be a cause of “gridlock”.

However, I am not patrolling Barnsdale @ 416 24/7, so I am reaching out to councillors whose wards are proximal to that location to ask if any incidence of so-called “gridlock” has been brought to their attention by citizens, city staff, provincial officials, or other parties.

Please inform me if that has happened to you, and the details of the claim, with emphasis on the evidence provided to establish the incidence of “gridlock”.

Kind regards,

Dr. Barry Wellar, C.M.
Professor Emeritus, University of Ottawa
President, Information Research Board, (IRB) Inc.
133 Ridgefield Crescent
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<https://wellar.ca/informationresearch/>

No reply to the questions asked was received from Brown, Darouze, Desroches, or Hill regarding the Barnsdale Road and 401 funding announcement.

After sending a reply which did not deal with the questions asked, Councillor Lo provided a pertinent reply. He was not contacted by any provincial official regarding the claim that gridlock is justification for the funding decision and had no communications from ward residents about gridlock.

The bottom line in both cases is that it appears:

- The Ontario government did not contact any councillor regarding gridlock as the basis of the Road 174 or Barnsdale Road and 416 funding actions,
- There is no sign that gridlock data were asked for from the City of Ottawa, and
- No contacted councillor mentioned having knowledge of any provincial gridlock-related traffic studies on or proximal to Road 174 or in the vicinity of the Barnsdale and 416 interchange.

One possibility is that, unknown to councillors, Mayor Mark Sutcliffe engaged in discussions with provincial officials in which the “g” word was invoked, but that is a possibility rife with deniability off-ramps, so it is not pursued here.

And then, subsequent to more inquiries which did not shed light on who if anyone in the Ottawa area put the “g” word on the table for input to the Ontario government ad, and which did not yield a municipal or provincial who affirmed a gridlock situation in her or his ward or riding, exhibit 9 was received from MTO media in response to the email to Minister Sarkaria in exhibit 6.

Exhibit 9. Response from MTO 277-2024-12553: Government-sponsored radio broadcast aired in the Ottawa area in September and/or October and/or November 2024

From: MTO INFO <MTOINFO@ontario.ca>
Sent: Tuesday, December 10, 2024, 8:17 AM
To: Barry Wellar <wellar.barry@gmail.com>
Subject: 277-2024-12553: Government-sponsored radio broadcast aired in the Ottawa area in September and/or October and/or November 2024

Hello,

Thank you for contacting the Ministry of Transportation (MTO).

Below is the information you requested:

We have a plan that’s connecting Ontario
We are upgrading Ottawa’s major routes and rural roads, like Ottawa Road 174
And developing a new interchange at Highway 416 and Barnsdale Road to relieve
gridlock and shorten daily commutes
All so you can get around faster, safer, easier
See what we’re building in your community at ontario.ca/builds
Paid for by the Government of Ontario”

The radio ad was in-market for the last 2 weeks of April through to the end of May, and September into the first 3 weeks of October.

We thank you for your inquiry and encourage you to contact us in the future.

Sincerely,

Louise

Ministry of Transportation's Communications Branch

That message identified the planned, new 416-Barndale Road interchange as being due to gridlock, as did a media announcement with the lead paragraph:

“The Ontario government is fighting gridlock in south Ottawa by investing \$5 million in a new interchange at Highway 416 and Barnsdale Road. The interchange will save commuters time in the rapidly growing community of Barrhaven and connect more people to housing and jobs across the region”. (<https://news.ontario.ca/en/release/1004438/ontario-building-new-highway-416-interchange>)”

However, Map 1 illustrates why questions arise as to what MOT and the Ontario government are thinking by using the term “gridlock” to justify an interchange at this location.

As shown, this is a low-density development area for kilometres in all directions, and repeated searches as well as discussions with area residents have not identified a single location that could host even a minor gridlock event.

The word “hallucinating” quickly came to mind during discussions about how anyone could use the term gridlock when trying to justify spending public money on an interchange at this location out in “the boondocks”.

However, once discussions got past initial impressions, the phase of sober second thought kicked in for several reasons.

First, \$5 million is hardly chump change when health care, homelessness, and other social needs in financially strapped Ottawa are taken into account, so the word waste seems fitting.

Second, it is obvious that congestion is not likely to become a saturation-level problem in that area for many decades, so motives behind such a seeming waste of public funds became top of mind. Early thoughts about motivations for an interchange in the middle of nowhere include provincial and municipal politicians trying to influence votes of private vehicle operators, and political donations from road builders and developers.

Map 1. Low-Density Environs of the 416-Barnsdale Road Interchange Area

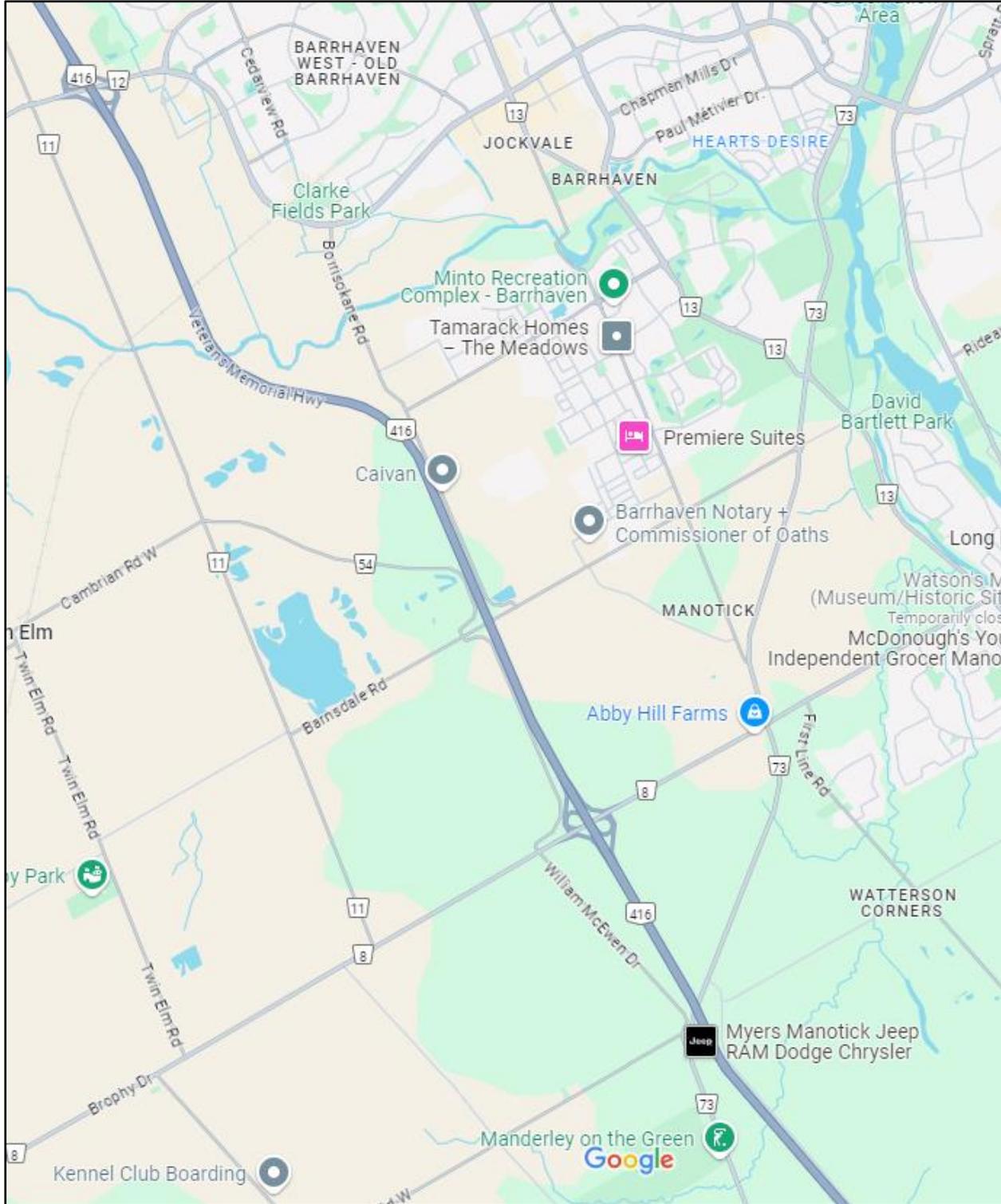


Exhibit 10. Selected Journal, Professional, and Conference Publications on Gridlock, Congestion, and Cycling by B. Wellar

Exhibit 10 presents a selection of my published works on the topics of gridlock, congestion, and cycling.

The purpose of this exhibit is to inform the reader of previous research activities which contributed to the communications to Premier Ford and Minister Sarkaria. The same list of publications was also intended to be sent to officials named by Ford or Sarkaria to explain the reasons behind the government's positions on gridlock, congestion, and removal of bike lanes. **(5)**

A dozen online and readily available publications which provide links to more publications are selected for illustrative purposes. Additional productions can be viewed at <https://wellar.ca/informationresearch/>.

The materials in table 1 provide a context for issues to raise with MTO officials if any are named by politicians Ford and Sarkaria to engage in discussions.

And, they also provide criteria to use in assessing the utility of the Universal Law of Location to assess government statements regarding gridlock, congestion, and removal of bike lanes. **(6)**

It is appropriate to close this section by acknowledging that many of the ideas contained in those productions have their origins in the classic 1967 text, ***Urban Development Models***. **(7)**

The publication of ***Urban Development Models (UDM)*** brought a new order of thinking about an integrated land use planning and transportation planning relationship. Further, the UDM conference and text provided many of the talking points that some 25-35 years later began to be imbedded as principles and practices in sustainable transport thinking about the interdependence of four people modes of urban transport, that is, walking, cycling, transit, and private motor vehicles.

Those materials are the primary sources of criteria for assessing the utility of the Universal Law of Location as a transportation planning and decision tool. And, unlike trying to access MTO files, or those of Minister Sarkaria and Premier Ford, those materials are out there front and center for all to see in full detail.

Table 1. Selected Publications by B. Wellar on Gridlock, Congestion, and Cycling that Provide Context for Sections A, B, V, and G

1. [What's Behind the Nonsense About Traffic Gridlock in Canada?](#)
2. [Tracking the Motives Behind the Phony War on "Traffic Gridlock"](#)
3. [Traffic Gridlock: A Bad, Mis-Leading Metaphor that Makes for Bad, Mis-Directed Public Policy](#)
4. [Traffic Gridlock: The Real Deal or a Pile of Nonsense?](#)
5. ["Taking steps towards the end of the automobile era"](#)
6. [Analysis of Responses to Questions, Questions, and More Questions about Ottawa's LRT Plan, 2009 Edition](#)
7. [Universal Law of Location Supported by GIS as a Best Practice Element in Land Use Planning and Transportation Planning Decision Systems](#)
8. [Cutting to the Chase in Designing New Measures of Transportation System Performance, identifying five catalysts for change in transportation thinking](#)
9. [Sustainable Transport: Does Anybody Here Know How to Win This Game?](#)
10. [Enriching Sustainable Transport Decisions: Inputs from Operations Research and the Management Sciences: CORS-INFORMS 2009](#)
11. [Further Analysis of HOV Lane and Sustainable Transport Failures in Ontario: Ottawa Case Study](#)
12. [Best Practices Framework Needed for Sustainable Transit in Ottawa](#)
13. [Transportation: *Inspiring* a Sustainability Action Agenda](#)
14. [Inspiring a Sustainability Action Agenda for the 2nd Annual Sustainable Community Summit](#)
15. [Sustainable Transport by Design or by Default? Either Way, the Wasteful Ride Is Over](#)

D. Communications with Officials

Communications to Minister Sarkaria and Premier Ford requesting the names and email addresses of officials who provide them with advice on gridlock, congestion, removing bike lanes were not answered.

As a result, we have no knowledge of the experts who provided or currently provide advice to the minister or premier for their statements on gridlock, congestion, or removal of bike lanes, matters which appear to be far outside the education, training, or practical experience skill sets of either Mr. Ford or Mr. Sarkaria. **(8)**

Fortunately, previous research on accountability and transparency issues involving both elected and appointed officials provides a heads up on how to deal with this “cone of silence” situation. **(9)**

Based on my experience and communications with researchers and civic activists from across Canada who have engaged with politicians of all stripes at all levels, politicians do not turn down an opportunity to have an official “make the politician look good”.

And, conversely, if it seems likely that a politician will suffer negative consequences as a result of an official being asked about the story behind a politician’s actions or statements, then it is verging on certainty that all notions of accountability and transparency will be flushed in the name of political expediency.

In this case study, it would have been advantageous to query officials, because whatever they reply to questions about gridlock, congestion, and removal of bike lanes, the citizens of Ontario would be better informed about the competence of elected and appointed officials to make transportation systems and services decisions at the best practices level. **(10)**

Fortunately, Bill 212 along with social media and broadcast media reports are sufficient to assess the utility of the Universal Law of Location as a transportation planning and decision tool for investigating the data and evidence behind Ontario government statements about gridlock, congestion, and removal of bike lanes in urban centers.

A closing note is that in the following sections we follow the KIS (Keep it Simple) principle and treat the concepts of gridlock and congestion, and the act of removing bike lanes, as independent of each other rather than elements of an interdependent systems relationship.

That approach is consistent with the current simplistic language of government statements, including Bill 212, regarding gridlock, congestion, and removal of bike lanes.

Further, from a message delivery perspective, using the KIS approach reduces the degree of complexity involved in assessing the utility of the Universal Law of Location as a transportation planning and decision tool for evaluating government statements about gridlock, congestion, and the removal of bike lanes.

In section E we take the concept of gridlock out of the government's realm of fantasy notions and use geographic representations to demonstrate what gridlock means in real-world traffic conditions.

It is recalled and emphasized that we are unable to locate government data or evidence to support its statements about gridlock, and requests to be informed of officials to contact regarding use of the term about gridlock and other issues were not granted.

As a result, there was no opportunity to question officials about any challenges to the four reports (#s 1, 2, 3, and 4) in section C which use terms such as fantasy, fiction, fabrication, bizarre, ludicrous, nonsense, delusional, and related synonyms to refer to unsubstantiated claims about the existence of gridlock.

In the absence, therefore, of locating Ontario government data or evidence to confirm events of gridlock, or images representing gridlock conditions, published reports in section E are used for that purpose.

It is emphasized that should the government make up for its apparent gridlock data, gridlock evidence, and gridlock schematics shortfall, then a follow-on report could be prepared if warranted as a Universal Law of Location test case study.

E. Schematics Representing Vehicular Traffic Gridlock Conditions

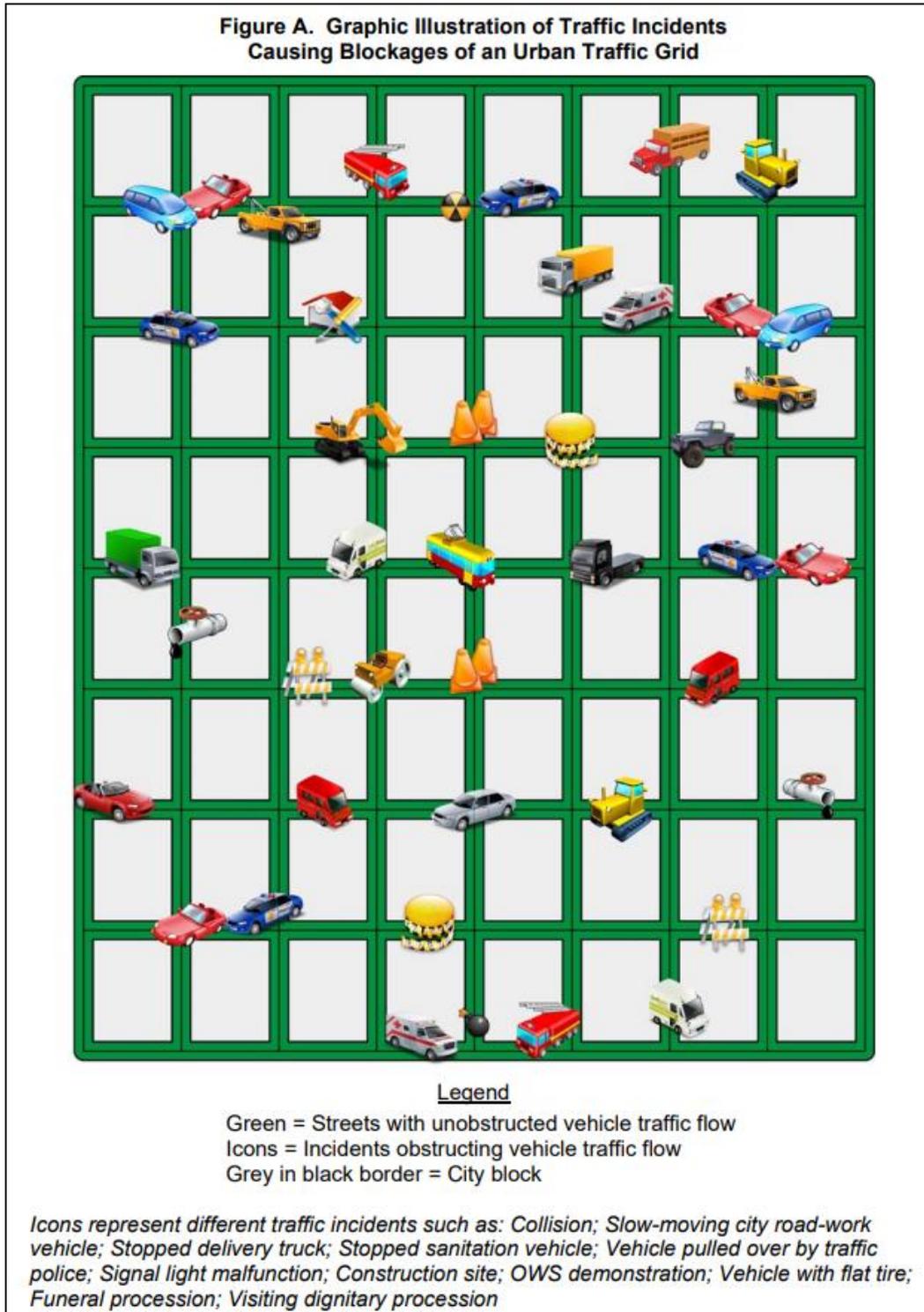
The four reports (#s 1, 2, 3, and 4) in section C provide detailed explanations about the physical meaning of vehicular traffic gridlock involving real roadway infrastructure and real vehicles.

Several schematics are selected for this report, because they are sufficient to assess the utility of the Universal Law of Location as a transportation planning and decision tool for investigating issues involving provincial statements about gridlock.

Schematic 1 displays the concept of vehicle traffic blockage, which occurs multiple times per hour on many street segments in any large city.

As shown, it is possible that “blocklock “could occur but, as the reader can readily ascertain by observation, even totally rendering immobile all the traffic that seeks to traverse intersections and street faces surrounding one block requires that total traffic jams simultaneously occur on surrounding streets and intersections to preclude vehicle movement away from the block that is locked. A more detailed explanation follows.

Schematic 1.



Source: [Traffic Gridlock: A Bad, Mis-Leading Metaphor that Makes for Bad, Mis-Directed Public Policy](#)

The following text is an excerpt taken from the original source.

“That is, there are degrees of blockage, ranging from minimal to completely plugged.

At the lower end of the scale, blockage may amount to little more than a minor irritation or inconvenience, but at the upper end it can be a totally miserable, life threatening, insufferable, etc., condition that requires significant adjustments or corrections being made to maintain the entity under duress.

Figure A is an illustration of vehicle traffic blockage. As shown, a number of street segments and intersections are obstructed. Consequently, motorized vehicle traffic cannot move in a free flow fashion down those specific streets or through those specific intersections due to such incidents as stalled vehicles, police issuing citations, sanitation trucks on their pick-up routes, delivery trucks stopping for drop-offs, signal lights out of commission, etc.

However, all the vehicles on all the other streets can move about relatively freely on the remainder of the street grid, and many of the vehicles on obstructed streets can reverse directions and/or turn left or right to get out of their current situations and can also use the remainder of the grid.

A similar line of argument holds for intersections which may be obstructed in whole or in part due to collisions, stalled vehicles, fire or police situations, left-turning vehicles, demonstrations, large volumes of pedestrians, parades, etc.

The timeworn response has been that if full or near-full blockage occurs at one intersection, vehicles are routed through other less-obstructed intersections.”

The preceding paragraphs, and variations of Figure A with more or fewer obstructions at a given point in time, let us say an hour, not only describe and portray the daily motor vehicle traffic situation in many cities in the modern, urbanized world, they describe a relationship that has been building in numerous cities over many decades. Namely, traffic congestion tends to be part-and-parcel of the urbanization process.”

We now move from the realistic concept of blockage for which there is empirical evidence, to gridlock for which no empirical evidence was located in studies done ten years ago, or for the current research.

“With traffic blockage as the (good) metaphor of context, we now move on to the metaphor of primary interest, “traffic gridlock”.

Figure B is based on the same street grid as Figure A, but instead of bits and pieces of motor vehicle traffic blockage here and there, what we now have is a situation wherein numerous intersections and street segments inside the perimeter of the grid are obstructed to the degree and extent that traffic is totally locked in or it is totally locked out of much of the grid.

As a result, motor vehicle traffic in this area (inside the perimeter streets and intersections) cannot move forwards, cannot move backwards, and cannot move sideways. Traffic is gridlocked. Or, to re-phrase, it is paralyzed.

Which leads to the question, “Could traffic blockage ever become a traffic gridlock event, and thereby justify use of the traffic gridlock metaphor to describe traffic blockage that renders a grid or a non-trivial portion of a grid paralyzed?”

The answer is, “Of course, but, and this is a huge but, the likelihood of ever witnessing such an event based on the record to date is about the same as witnessing a flying pig”.

By way of brief explanation, to get from Figure A to Figure B requires that every street segment is plugged and every intersection is totally obstructed at the same time so that motor vehicle traffic is precluded from entering, moving within, or leaving the gridlocked zone.

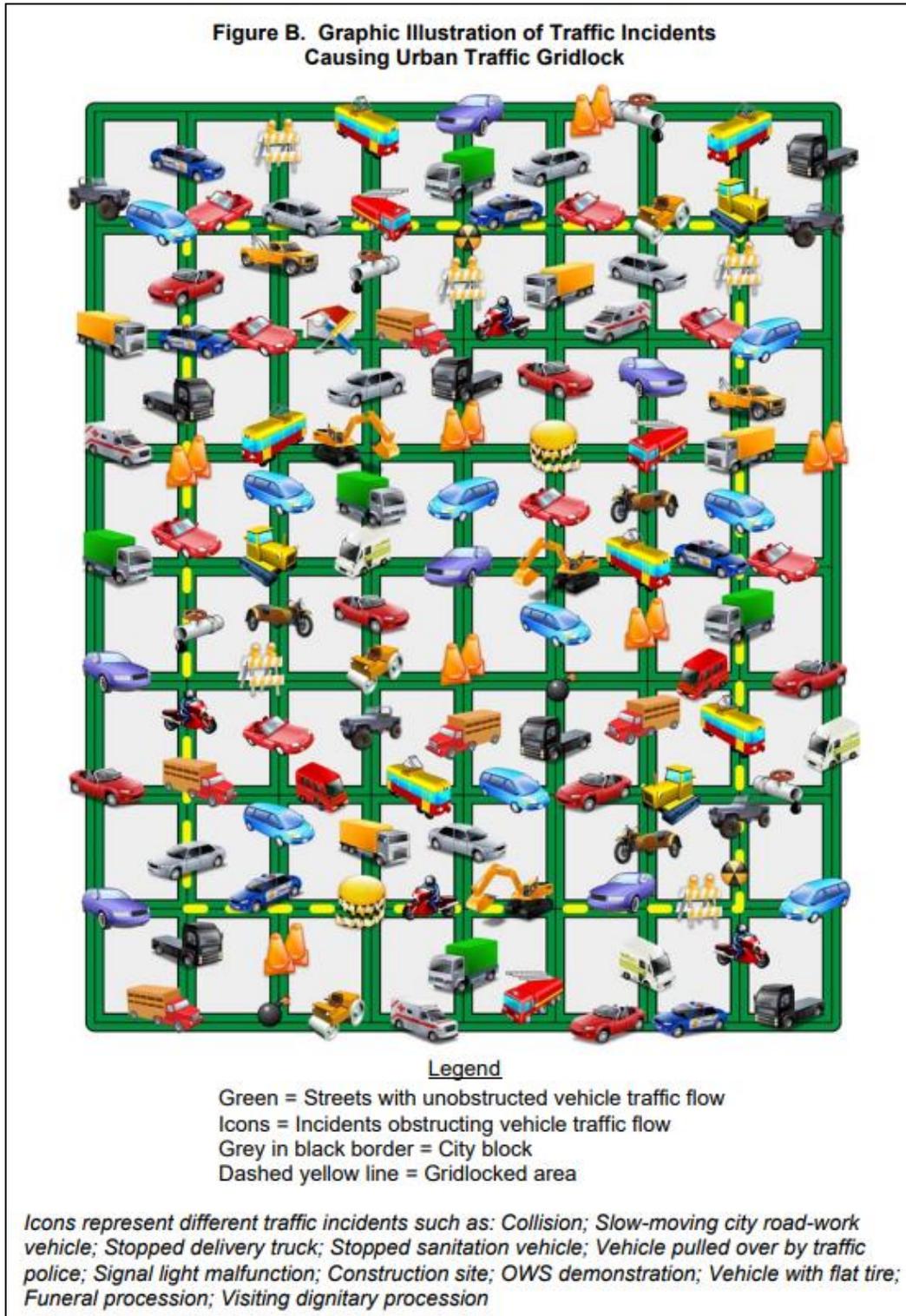
At the risk of entering into the domain of extreme hyperbole, what I believe it would take to reach such a state might be appropriately described as a raging epidemic of incidents occurring not just in short order, but originating from the centre of the gridlocked area and moving rapidly, systematically, and relentlessly outwards in a street-after-street and intersection-after-intersection fashion.”

Five more schematics are repeated here to illustrate what we looked at 13 years ago to explore the effort needed to simulate a gridlock process with a non-trivial number of intersections and road segments.

We have not seen empirical evidence of a gridlock event, but since MTO must have approved use of the term gridlock in the writing of Bill 212, it is reasonable to expect that it will provide the link to the software used to simulate gridlock events based on hypotheticals far more complex than those in schematics 1, 2, 3, 4, and 5.

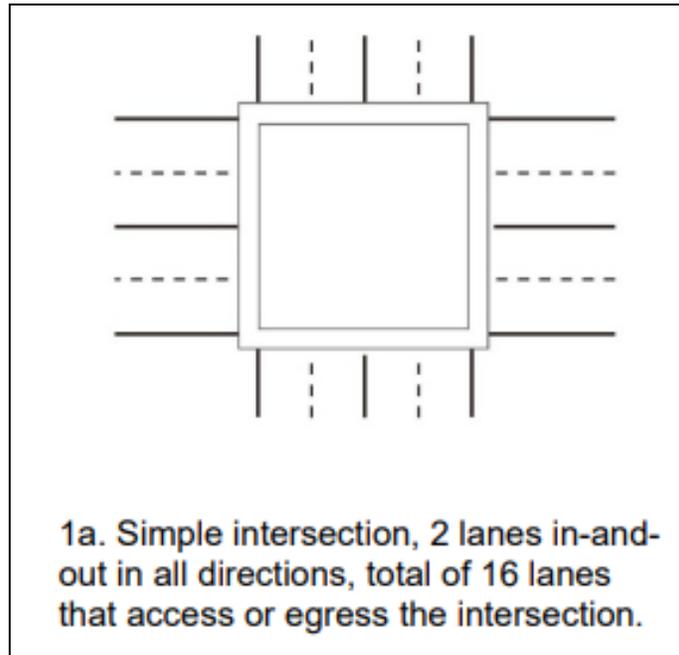
Further, due to advances in GIS science and technology over the past dozen years, if MOT uses simulation models to demonstrate how full-fledged gridlock events occur under different scenarios, then citizens may expect to see links to simulation models demonstrating how these events deconstruct over time and space.

Schematic 2.



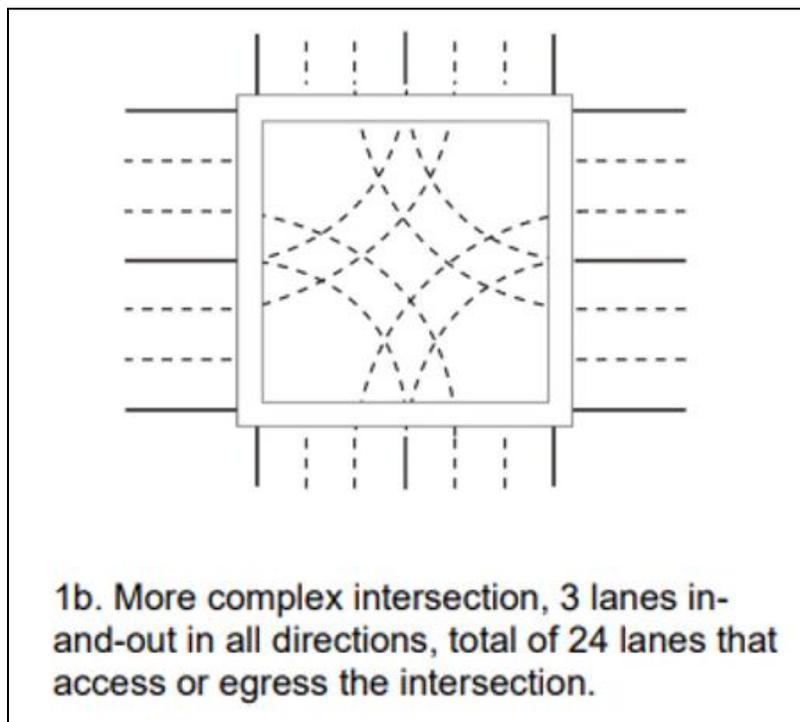
Source: [Traffic Gridlock: A Bad, Mis-Leading Metaphor that Makes for Bad, Mis-Directed Public Policy](#)

Schematic 3.



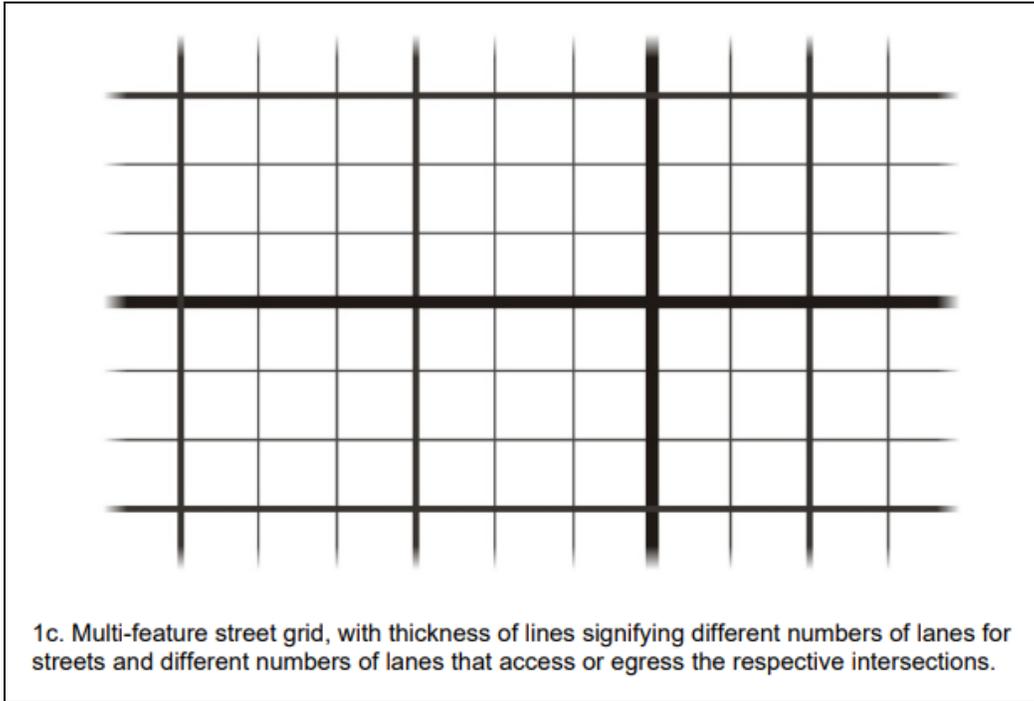
Source: [Traffic Gridlock: The Real Deal or a Pile of Nonsense?](#)

Schematic 4.



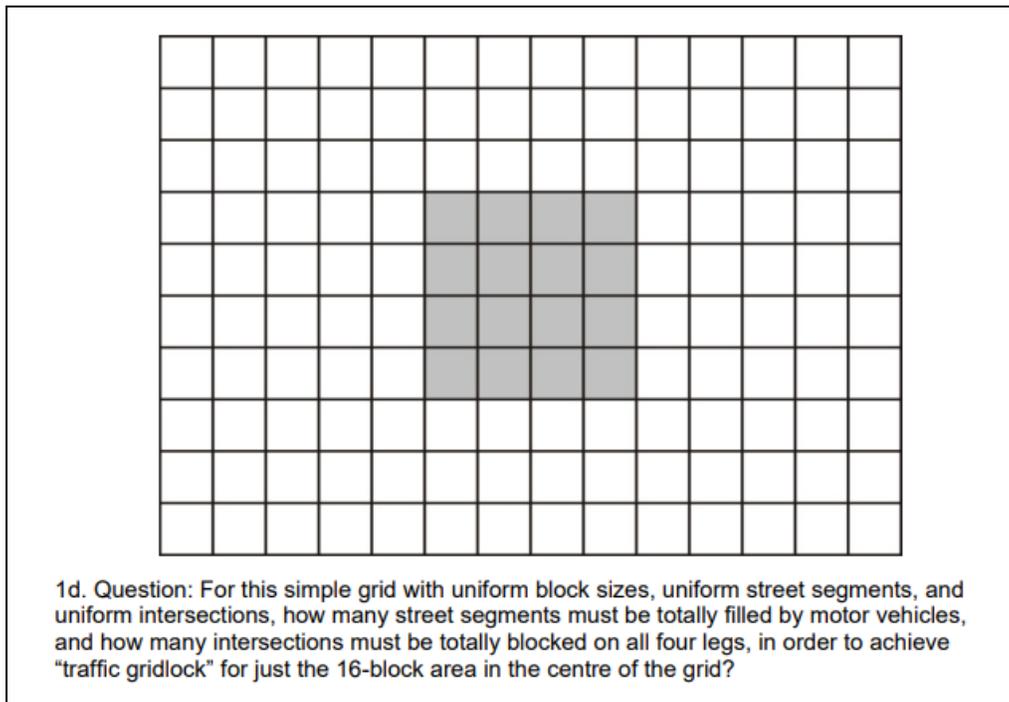
Source: [Traffic Gridlock: The Real Deal or a Pile of Nonsense?](#)

Schematic 5.



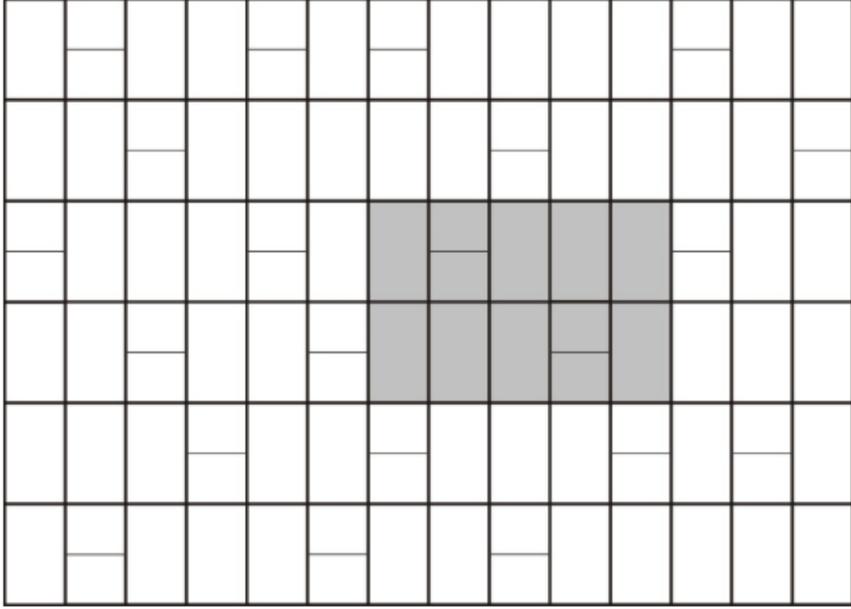
Source: [Traffic Gridlock: The Real Deal or a Pile of Nonsense?](#)

Schematic 6.



Source: [Traffic Gridlock: The Real Deal or a Pile of Nonsense?](#)

Schematic 7.



1e. Question: For this simple grid with irregular block sizes, irregular street segments, and uniform intersections, how many street segments must be totally filled by motor vehicles, and how many intersections must be totally blocked on all four legs, in order to achieve "traffic gridlock" for just the 10-block area in the centre of the grid?

Source: [Traffic Gridlock: The Real Deal or a Pile of Nonsense?](#)

It bears repeating that the schematics are representing a phenomenon which, to my knowledge, has never occurred in Ontario or Canada.

That said, and this observation cannot be over-emphasized, no evidence has been uncovered to demonstrate that the Government of Ontario has produced any verifiable documentation demonstrating the existence of even one incident of gridlock in the history of the province, not one, much less anything about chronic gridlock locations and situations. **(11)**

Should I be in error, then I look forward to receiving the links to documentation.

And, conversely, if the Government of Ontario cannot produce said evidence then one seemingly logical, immediate consequence is for Bill 212 to quickly become a legislative casualty of Minister Sarkaria and MTO.

That done, other consequences to follow in domino-like fashion include reversal of road-modification projects based on the fantasy notion of gridlock.

F. Assessing the Utility of the Universal Law of Location as a Transportation Planning and Decision Tool for Evaluating Government Statements about Gridlock

The tests of utility of the Universal Law of Location with regard to evaluating government statements about gridlock are that the Law:

1. Contributes to enhancing data and evidence about the occurrence of gridlock situations, and the location-related conditions susceptible to the occurrence of gridlock events. **(12)**
2. Contributes terms of reference for data-driven or evidence-based studies to support decisions about location-related actions to rectify gridlock situations. **(13)**

The Universal Law of Location establishes that **if** gridlock exists, then a gridlock event consisting of motor vehicles by the many hundreds clustered on dozens of adjoining road segments with common intersections is the something that occurs somewhere on Earth's surface.

Several graphics published more than 10 years ago (See section E) provide representations of vehicular traffic gridlock events which, if they occur, are easily captured via traffic studies and numerous kinds of imaging systems, including smart phones.

The apparent fact that no government statement regarding gridlock is supported by data or evidence of even one gridlock event in Ontario in recent years or decades for that matter, seems more than sufficient cause for rational people to reject making or accepting claims about gridlock. And that being the case, it seems to follow for those with rational thinking skills to categorically reject even the notion of Bill 212, Reducing Gridlock, Saving You Time Act, 2024.

Or, to re-phrase, on the one hand citizens, researchers, journalists, municipal politicians, and anyone else with an interest in this matter is told via Bill 212 that Ontario needs this legislation.

On the other hand, however, numerous communications to government officials, searches of government files, scans of media and social media, and searches of various literatures do not reveal the data and evidence used by the Government of Ontario to justify Bill 212, and give it credence as a substantive document rather than an ideological pursuit.

That is, we have not obtained or been directed to data and/or evidence of actual gridlock events which the Government of Ontario can demonstrate actually and factually occurred by putting on display:

- traffic study evidence
- traffic helicopter imagery
- drone-based imagery
- satellite imagery
- police dispatch messages
- fire department messages
- taxi dispatch messages
- transit dispatch messages
- ambulance dispatch messages
- bike messenger videos
- verifiable eyewitness statements from individuals on their balconies
- Facebook postings

If that is the case – there are no bodies of data and no bodies of evidence – then it means, *de facto*, that no gridlock event occurred anywhere in Ontario, even while the Government of Ontario went through the process of passing Bill 212 in the name of gridlock both in the Bill title, and in the text. **(14)**

It therefore follows from the Universal Law of Location that references to gridlock are at best fictions, fabrications, hallucinations, delusions, deceptions, illusions, inventions, creations, misconceptions, misrepresentations, etc., and have no factual or evidentiary connection to the reality of levels of congestion that are actually experienced 24/365 on every road segment in every part of Ontario.

It is therefore reasonable to conclude that the Universal Law of Location satisfies the first utility test.

Namely it establishes that without proper data and evidence to support statements about the existence of gridlock, which is a geographic phenomenon and, hence, a mappable phenomenon, any such claims have no substantive basis and amount to no more than groundless assertions. The colloquial term “hogwash” comes to mind.

Further, the Universal Law of Location also meets the second utility test by its contribution to terms of reference for data-driven or evidence-based studies to support decisions about location-related actions to rectify so-called gridlock situations.

That is, if the Government of Ontario pursues the notion of gridlock, then the Universal Law of Location informs the Government of Ontario that gridlock is a geographic phenomenon which builds from scratch to saturation levels, road segment by road segment including intersections, whereby vehicles enter the grid in such ways that they converge from the outside-in to the block of road segments including intersections which form the nucleus, and then more vehicles are steadily added to the “pile” in increasing volumes from outside-in and in all directions so that no vehicles can escape, thereby creating a locked grid within a larger collection of road segments and intersections for a number of intersections and street sections.

All that said, lab research involving simulation techniques reveals that not only are a bizarre set of road rules required to achieve even virtual gridlock, but many hundreds of vehicle operators are required to drive in lockstep, outside-in fashion from all outlying directions towards a nucleus of street segments, e.g., a mini-grid of four adjacent blocks, which then become the core of an ever-expanding inside-out nucleus in order to create a gridlock situation that amounts to more than just an everyday traffic jam. (15)

As noted in previous publications, those conditions explain why there are few gridlock cases in motor vehicle history, and none, ever, in Ontario. (16)

And they also affirm that the utility of the Universal Law of Location includes relegating the gridlock notion to the realm of fiction and affirms why, in the real world of traffic physics and spatial analysis, the notion of gridlock is a notion of fantasy. (17)

G. Assessing the Utility of the Universal Law of Location as a Transportation Planning and Decision Tool for Evaluating Government Statements about Congestion

The tests of utility of the Universal Law of Location with regard to evaluating government statements about congestion are that the Law:

1. Contributes to enhancing data and evidence about the occurrence of congestion situations, and the location-related conditions susceptible to the occurrence of congestion events. (18)
2. Contributes terms of reference for data-driven or evidence-based studies to support decisions about location-related actions to rectify congestion situations.

Before proceeding into section G, it is again emphasized that the concept of “gridlock” has been shown to have no grounding in traffic reality and is the stuff of fantasy.

Rather, it appears fair to say, the term is used for sensationalism, distraction, feeding ideologies and pipedreams, and often to cover up for lack of traffic knowledge. Again, however, it has nothing to do with the general reality of motor vehicle-based congestion.

By divorcing the fantasy notion of gridlock from our analysis, we can focus on the concept of congestion, which is a real-world traffic condition, and is an entity consisting of road infrastructure and motor vehicles.

To put the concept of “traffic congestion” in context, entering it as a term in the search window of Google generates about 112,000,000 results, that is 112,000,000 web pages contain the phrase “traffic congestion”.

Google search results attest to the popularity of the phrase “traffic congestion”, and its broad societal importance. However, our interest in this report is limited to assessing the utility of the Universal Law of Location as a transportation planning and decision tool for evaluating government statements about congestion.

As a result, our interest is in evaluating the substance, validity, verifiability, etc. upon which statements are based, and that means we need the data and the evidence underlying statements for review and analysis.

Regrettably, due to the absence of instructions from officials about how to access data and evidence supporting government statements, we have no official data or evidence, and must adopt a default position.

That is, political statements about congestion in the public domain in recent years, and in recent months in particular, amount to little more than pronouncements that congestion is bad, and that it must be fixed. End of story, no substantive explanations, just data-absent and evidence-absent claims offered as truth without proof.

Our default approach, therefore, is to review pronouncements and develop a body of questions about data and evidence which in a rational, responsible, and duty-bound world would have been asked of and answered by officials, and then both questions and answers would be respected in pronouncements and decisions by politicians.

A rigorous process of that nature could have led to the following outcomes:

1. Data needed to support politicians’ pronouncements.
2. Data needed by citizens to examine the basis of MTO work provided for politicians’ pronouncements.
3. Data needed by citizens to ensure politicians’ pronouncements are consistent with MTO work.
4. Evidence needed to support politicians’ pronouncements.

5. Evidence needed by citizens to examine MTO work provided to politicians for pronouncements.
6. Evidence needed by citizens to ensure politicians' pronouncements are consistent with MTO work.
7. Data needed to assess the utility of the Universal Law of Location as a transportation planning and decision tool for evaluating government statements about congestion.
8. Evidence needed to assess the utility of the Universal Law of Location as a transportation planning and decision tool for evaluating government statements about congestion.
9. Terms of reference for data-driven studies to support decisions about location-related actions to rectify congestion situations.
10. Terms of reference for evidence-based studies to support decisions about location-related actions to rectify congestion situations.

Again, access to officials was not granted, and that limitation meant we did not have access to the congestion data and evidence that officials provide to politicians.

As a result of what might be perceived as “off-loading” by MTO, it is necessary to prescribe the data and evidence that could be part of MTO’s congestion study file. That is, off-loading by MTO or not, this activity is necessary because regardless of what MTO does, data and evidence are needed by citizens, researchers, journalists, city politicians, and provincial opposition politicians to critically examine statements by Premier Ford and Minister Sarkaria on traffic congestion.

A selection of prescribed data needs is presented in table 2, and a selection of prescribed evidence needs is presented in table 3.

Two dozen items are listed in table 2 to illustrate the kinds of data which are pertinent to making and executing decisions about congestion.

Numerous media reports of pronouncements on congestion by Premier Ford and Minister Sarkaria did not mention any of those variables, and communications to politicians Ford and Sarkaria did not yield any feedback on MTO data files on congestion.

Since we have no confirmation as to the data on congestion held by MTO or brought to the attention of politicians Ford and Sarkaria, the prudent assumption is that such data do not exist, and we wait to learn from MTO about the data which it has on file that have been used in specific pronouncements by Premier Ford and Minister Sarkaria.

Table 2. Selection of Data Needed by Citizens, Researchers, Media to Critically Examine Statements by Premier Ford and Minister Sarkaria on Traffic Congestion: A Universal Law of Location Perspective

1. Geo-data on where saturation capacity occurs
2. Geo-data on where excess capacity occurs
3. Geo-data on the locations of classes of congestion from saturation to no concern
4. Geo-data on where choke points are located
5. Geo-data on origins of traffic causing congestion
6. Geo-data on destinations of traffic causing congestion
7. Geo-data on origins-destinations of traffic causing congestion
8. Geo-data on inflection points where action needs to be taken on roadways to mitigate congestion levels
9. Geo-data on where saturation level congestion occurs on Ontario provincial roadways
10. Geo-data on where saturation level congestion occurs on Ontario city roadways
11. Geo-data on location of on-ramps to control congestion building
12. Geo-data on location of active signs to divert traffic
13. Geo-data on where bicycle traffic causes motor vehicle traffic saturation levels
14. Geo-data on where road infrastructure is over-built
15. Geo-data on locations where excessive motor vehicle speeds require interventions
16. Geo-data on where flexibility is built into roads and signage to dynamically adjust capacity to better handle traffic loadings
17. Locations where the provincial government has acted to reduce demand for private motor vehicle use
18. Locations where the provincial government has acted to shift travel demand from private motor vehicles to transit
19. Locations where the provincial government has acted to shift travel demand from private motor vehicles to cycling

Table 2. Selection of Data Needed by Citizens, Researchers, Media to Critically Examine Statements by Premier Ford and Minister Sarkaria on Traffic Congestion: A Universal Law of Location Perspective (Continued)

20. Locations where the provincial government has acted to shift travel demand from private motor vehicles to walking
21. Locations where the provincial government has acted to shift travel demand from transit to private motor vehicles
22. Geo-data on locations of land uses converted to road infrastructure to reduce congestion for private motor vehicle travel
23. Geo-data on the spatial impact of reducing congestion for private motor vehicle travel
24. Geo-data on the zero-sum impact of congestion reduction on Ontario's current land use inventory

In the meantime, and anticipating an untimely response from officials at MTO about how it does its work for Ford and Sarkaria, it appears reasonable and prudent to assume that if the data needs presented in table 2 are met by MTO, they would significantly increase the capability of citizens, researchers, opposition politicians, and journalists to critically examine statements by Premier Ford and Minister Sarkaria on traffic congestion. **(19)**

It is therefore concluded that the utility of the Universal Law of Location is confirmed by its contribution to enhancing data about the occurrence of congestion situations, and the location-related conditions susceptible to the occurrence of congestion events.

Table 3 builds on table 2 to move the test of utility of the Universal Law of Location beyond contributing to the data story. That is, specifying and collecting data are necessary activities, but are early steps in the decision process. A subsequent step is to turn the data into evidence as the basis for decisions.

For consistency and continuity, wherever practical we retain the variables and modify the data orientation to an evidence orientation. As noted previously, our focus is on presenting how the Universal Law of Location contributes to enhancing data and evidence about the occurrence of congestion situations, and about the location-related conditions susceptible to the occurrence of motor vehicle congestion from minor to saturation levels.

Table 3. Evidence Needed by Citizens, Researchers, Opposition Politicians, Municipal Politicians, Journalists to Critically Examine Statements by Premier Ford and Minister Sarkaria on Traffic Congestion: A Universal Law of Location Perspective

1. Evidence of where saturation capacity occurs
2. Evidence of where excess capacity occurs
3. Evidence of the locations of classes of congestion from saturation to no concern
4. Evidence of where choke points are located
5. Evidence of origins of traffic causing congestion
6. Evidence of destinations of traffic causing congestion
7. Evidence of origins-destinations of traffic causing congestion
8. Evidence of inflection points where action needs to be taken on roadways to mitigate congestion levels
9. Evidence of where saturation level congestion occurs on Ontario provincial roadways
10. Evidence of where saturation level congestion occurs on Ontario city roadways
11. Evidence of location of on-ramps to control congestion building
12. Evidence of location of active signs to divert traffic
13. Evidence of where bicycle traffic causes motor vehicle traffic saturation levels
14. Evidence of where road infrastructure is over-built
15. Evidence of locations where excessive motor vehicle speeds require interventions
16. Evidence of where flexibility is built into roads and signage to dynamically adjust capacity to better handle traffic loadings
17. Evidence of where the provincial government has acted to reduce demand for private motor vehicle use
18. Evidence of where the provincial government has acted to shift travel demand from private motor vehicles to transit

Table 3. Evidence Needed by Citizens, Researchers, Opposition Politicians, Municipal Politicians, Journalists to Critically Examine Statements by Premier Ford and Minister Sarkaria on Traffic Congestion: A Universal Law of Location Perspective (Continued)

19. Evidence of where the provincial government has acted to shift travel demand from private motor vehicles to cycling
20. Evidence of where the provincial government has acted to shift travel demand from private motor vehicles to walking
21. Evidence of where the provincial government has acted to shift travel demand from transit to private motor vehicles
22. Evidence of locations of land uses converted to road infrastructure to reduce congestion for private motor vehicle travel
23. Evidence of the spatial impact of reducing congestion for private motor vehicle travel
24. Evidence of the zero-sum impact of congestion reduction on Ontario's current land use inventory

Testing the Universal Law of Location for its utility includes asking questions about and expressing the need for analysis and synthesis research which critically explores politicians' pronouncements and agency claims about congestion issues and initiatives.

Guided by the Universal Law of Location that something is everywhere, table 3 contains two dozen entries about evidence which are pertinent to making and evaluating decisions about congestion levels.

Examination of numerous reports on pronouncements on congestion by Premier Ford and Minister Sarkaria did not mention any of these entries, or any others that I could ascertain. Further, communications to politicians Ford and Sarkaria did not yield any feedback from MTO about files of evidence regarding their pronouncements on congestion.

It is therefore concluded that the utility of the Universal Law of Location is confirmed by its contribution to enhancing evidence-based research into such matters as the occurrence of congestion situations, the location-related conditions susceptible to the occurrence of different levels of congestion, and the mix and impacts of mitigation and mediation measures used to manage congestion.

Further, the Universal Law of Location also meets the second utility test by its contribution to terms of reference for data-driven or evidence-based studies to support decisions about location-related actions to modify congestion situations and levels.

That is, tables of data variables and evidence variables are presented for both exploratory and confirmatory studies dealing with questions, concerns, problems, relationships, goals, objectives, etc., involving transportation system infrastructure, the environs of transportation system infrastructure, private and public means of transport, and the walking, cycling, transit, and private motor vehicle modes of people transport,

H. Assessing the Utility of the Universal Law of Location as a Transportation Planning and Decision Tool for Evaluating Government Statements about Removal of Bike Lanes

Previous discussions found references to so-called gridlock to be an exercise in fantasy, as there are no data and no evidence to attest that even one gridlock event of even minor significance has occurred in Ontario.

As a result, there are no references to gridlock in association with removal of bike lanes.

However, in pronouncements by politicians Ford and Sarkaria, motor vehicle congestion is causally associated with removal of bike lanes. Consequently, some of the congestion data variables and congestion evidence variables presented in tables are incorporated in tables 4 and 5.

Communications with officials about the contents of tables regarding gridlock data and congestion data could have resulted in changes to table 4.

However, there is no indication that provincial political pronouncements about removing bike lanes make any substantive reference to the contents of the data tables regarding gridlock or congestion. Therefore, it is consistent with political reality for this report to present the data needs expressed in table 4 in a standalone manner.

Two dozen items are listed in table 4 to illustrate the kinds of data which are pertinent to making and executing informed decisions about removal of bike lanes.

Numerous media reports of pronouncements on removal of bike lanes by Premier Ford and Minister Sarkaria did not mention any of those variables, and communications to politicians Ford and Sarkaria did not yield any feedback on MTO data files on removal of bike lanes.

Table 4. Selection of Data Needed by Citizens, Researchers, Municipalities, and Journalists to Critically Examine Statements by Premier Ford and Minister Sarkaria on Removal of Bike Lanes: A Universal Law of Location Perspective

1. Geo-data on where bike lanes cause saturation capacity
2. Geo-data on where bike lanes cause excess capacity
3. Geo-data on where bike lanes affect the locations of classes of congestion
4. Geo-data on where bike lanes cause vehicle traffic choke points
5. Geo-data on origins of cycle traffic causing excess congestion
6. Geo-data on destinations of cycle traffic causing excess congestion
7. Geo-data on origins-destinations of cycle traffic causing excess congestion
8. Geo-data on where cycling causes congestion inflection points and action needs to be taken on roadways to mitigate excess congestion levels
9. Geo-data on where cycling causes saturation level congestion on Ontario provincial roadways
10. Geo-data on where saturation level congestion occurs on Ontario city roadways
11. Geo-data on location of on-ramps to control congestion as a result of bikes
12. Geo-data on location of active signs to divert bike traffic
13. Geo-data on where road infrastructure for bikes is over-built
14. Geo-data on locations where excessive motor vehicle speeds require bike lane interventions for cyclists.
15. Geo-data on where flexibility is built into roads and signage to dynamically adjust capacity to better handle motor vehicle and bike traffic loadings
16. Locations where the provincial government has acted to increase demand for bikes
17. Locations where the provincial government has acted to shift travel demand from private motor vehicles to cycling
18. Locations where the provincial government has acted to shift travel demand from cycling to private motor vehicles
19. Geo-data on land use impacts as a result of converting vehicle traffic lanes to bike lanes

Table 4. Selection of Data Needed by Citizens, Researchers, Municipalities, and Journalists to Critically Examine Statements by Premier Ford and Minister Sarkaria on Removal of Bike Lanes: A Universal Law of Location Perspective (Continued)

20. Geo-data on land use impacts as a result of converting bike lanes to vehicle traffic lanes
21. Geo-data on environmental impacts as a result of converting vehicle traffic lanes to bike lanes
22. Geo-data on environmental impacts as a result of converting bike lanes to vehicle lanes
23. Geo-data on safety impacts on pedestrians as a result of converting vehicle traffic lanes to bike lanes
24. Geo-data on safety impacts on pedestrians as a result of converting bike lanes to vehicle traffic lanes
25. Geo-data on safety impacts on cyclists as a result of converting vehicle traffic lanes to bike lanes
26. Geo-data on safety impacts on cyclists as a result of converting bike lanes to vehicle traffic lanes
27. Geo-data on the zero-sum impact on modal splits by neighbourhood as a result of removing bike lanes
28. Geo-data on the zero-sum impact on modal splits by ward as a result of removing bike lanes
29. Geo-data on the zero-sum impact on modal splits citywide as a result of removing bike lanes
30. Geo-data on the zero-sum impact on modal splits by neighbourhood as a result of adding bike lanes
31. Geo-data on the zero-sum impact on modal splits by ward as a result of adding bike lanes
32. Geo-data on the zero-sum impact on modal splits citywide as a result of adding bike lanes

Since we have no confirmation as to the data held by MTO on removal of bike lanes, or data brought to the attention of politicians Ford and Sarkaria, the prudent assumption is that such data do not exist, and our default position is to wait to learn from MTO about the data which it has on file that have been used in specific pronouncements by Premier Ford and Minister Sarkaria.

In the meantime, and not anticipating a timely response from officials at MTO, it appears reasonable and prudent to assume that if the data needs presented in table 4 are met by MTO, they would significantly increase the capability of citizens, researchers, opposition politicians, and journalists to critically examine statements by Premier Ford and Minister Sarkaria on removal of bike lanes.

It is therefore concluded that the utility of the Universal Law of Location is confirmed by its contribution to enhancing data needed by citizens, researchers, opposition politicians, municipal politicians, and journalists to critically evaluate decisions by the provincial government to remove bike lanes.

Table 5 builds on table 4 to move the test of utility of the Universal Law of Location beyond contributing to the data story. That is, specifying and collecting data are necessary but early steps in the decision process. A subsequent step is to turn the data into evidence as the basis for decisions.

For consistency and continuity, wherever practical we retain the variables and modify the data orientation to an evidence orientation. As noted previously, our focus is on presenting how the Universal Law of Location contributes to enhancing data and evidence needed by citizens, researchers, opposition politicians, municipal politicians, and journalists to critically evaluate decisions by the provincial government to remove bike lanes.

Testing the Universal Law of Location for its utility includes asking questions about and expressing the need for analysis and synthesis research which critically evaluates politicians' pronouncements and agency claims about reasons for removing bike lanes.

Guided by the Universal Law of Location that something is everywhere, table 5 contains two dozen entries about evidence which is pertinent to making and evaluating decisions about removing bike lanes.

Examination of pronouncements on congestion by Premier Ford and Minister Sarkaria did not mention any of the entries in table 5, and communications to politicians Ford and Sarkaria did not yield any feedback from MTO about files of evidence regarding the reasons for removing bike lanes.

It is therefore found that the Universal Law of Location also meets the second utility test by its contribution to terms of reference for data-driven or evidence-based research into decisions to remove bike lanes.

Table 5. Evidence Needed by Citizens, Researchers, Opposition Politicians, Municipal Politicians, and Journalists to Critically Examine Statements by Premier Ford and Minister Sarkaria about Removal of Bike Lanes: A Universal Law of Location Perspective

1. Evidence of where bike lanes cause saturation capacity
2. Evidence of where bike lanes cause excess capacity
3. Evidence of where bike lanes affect the locations of classes of congestion
4. Evidence of where bike lanes cause choke points
5. Evidence of origins of bike traffic causing excess congestion
6. Evidence of destinations of bike traffic causing excess congestion
7. Evidence of origins-destinations of bike traffic causing excess congestion
8. Evidence of where cycling causes congestion inflection points and action needs to be taken on roadways to mitigate excess congestion levels
9. Evidence of where cycling causes saturation level congestion on Ontario provincial roadways
10. Evidence of where saturation level congestion occurs on Ontario city roadways
11. Evidence of location of on-ramps to control congestion as a result of bikes
12. Evidence of location of active signs to divert bike traffic
13. Evidence of where road infrastructure for bikes is over-built
14. Evidence of locations where excessive motor vehicle speeds require safety interventions for cyclists
15. Evidence of where flexibility is built into roads and signage to dynamically adjust capacity to better handle motor vehicle and bike traffic loadings
16. Locations where the provincial government has acted to increase demand for bikes
17. Locations where the provincial government has acted to shift travel demand from private motor vehicles to cycling
18. Locations where the provincial government has acted to shift travel demand from cycling to private motor vehicles

Table 5. Evidence Needed by Citizens, Researchers, Opposition Politicians, Municipal Politicians, and Journalists to Critically Examine Statements by Premier Ford and Minister Sarkaria about Removal of Bike Lanes: A Universal Law of Location Perspective (Continued)

19. Evidence of land use impacts as a result of converting vehicle traffic lanes to bike lanes
20. Evidence of land use impacts as a result of converting bike lanes to vehicle lanes
21. Evidence of environmental impacts as a result of converting vehicle traffic lanes to bike lanes
22. Evidence of environmental impacts as a result of converting bike lanes to vehicle lanes
23. Evidence of safety impacts on pedestrians as a result of converting vehicle traffic lanes to bike lanes
24. Evidence of safety impacts on pedestrians as a result of converting bike lanes to vehicle traffic lanes
25. Evidence of safety impacts on cyclists as a result of converting vehicle traffic lanes to bike lanes
26. Evidence of safety impacts on cyclists as a result of converting bike lanes to vehicle traffic lanes
27. Evidence of the zero-sum impact on modal splits by neighbourhood as a result of adding bike lanes
28. Evidence of the zero-sum impact on modal splits by neighbourhood as a result of removing bike lanes
29. Evidence of the zero-sum impact on modal splits by ward as a result of adding bike lanes
30. Evidence of the zero-sum impact on modal splits by ward as a result of removing bike lanes
31. Evidence of the zero-sum impact on modal splits citywide as a result of adding bike lanes
32. Evidence of the zero-sum impact on modal splits citywide as a result of removing bike lanes

That is, tables of data variables and evidence variables are presented for both exploratory and confirmatory studies dealing with questions, concerns, problems, relationships, goals, objectives, etc., involving transportation system infrastructure, the environs of transportation system infrastructure, private and public means of transport,

and all modes of transport – walking, cycling, transit, and private motor vehicle – transporting people.

I. Conclusion

In this case study with its focus on Ontario government pronouncements about gridlock, congestion, and removal of bike lanes, the test for assessing the utility of the Universal Law of Location as a transportation planning and decision tool is whether:

1. It contributes to enhancing data and evidence about the occurrence of gridlock situations, and the location-related conditions susceptible to the occurrence of gridlock events.
2. It contributes terms of reference for data-driven and evidence-based studies to support decisions about location-related actions to rectify gridlock situations.
3. It contributes to enhancing data and evidence about the occurrence of congestion situations, and the location-related conditions susceptible to the occurrence of congestion events.
4. It contributes terms of reference for data-driven and evidence-based studies to support decisions about location-related actions to rectify congestion situations.
5. It contributes to enhancing data and evidence about location-related reasons for bike lanes to be a cause of motorized vehicle congestion, and location-related reasons for the removal of bike lanes to be a solution to motorized vehicle congestion.
6. It contributes terms of reference for data-driven and evidence-based studies to support decisions based on location-related reasons to remove bike lanes for being a cause of motorized vehicle congestion.

The first general conclusion is that the Universal Law of Location contributes to enhancing data and evidence for decisions about gridlock, congestion and removal of bike lanes, and contributes terms of reference for data-driven and evidence-based studies to support decisions regarding gridlock, congestion, and removal of bike lanes in Ontario municipalities.

As for the Ontario government positions on gridlock, congestion, and removal of bike lanes, based on obtained materials the findings are as follows.

1. The position on gridlock is not supported by data or evidence to establish its existence for even one single solitary event in Ontario history, which further consigns the notion of gridlock to transportation fantasyland.
2. To the extent that concerns about congestion are based on fantasy notions about gridlock, the concerns about congestion cannot be described by data nor demonstrated by evidence, which is a natural consequence of building a case on a fantasy foundation.
3. To the extent that concerns about congestion are attributed to the installation of bike lanes, no data and no evidence were located to describe and establish a consequential causal relationship.
4. To the extent that congestion relief is attributed to the removal of bike lanes, no data and no evidence were located to describe and establish a consequential causal relationship.
5. To the extent that the installation of bike lanes is deemed to have a consequential causal relationship with the increased incidence of motor vehicle congestion, no data and no evidence were located to describe and establish that relationship.
6. To the extent that the removal of bike lanes is deemed to have a consequential causal relationship with the decreased incidence of motor vehicle congestion, no data and no evidence were located to describe and establish that relationship.

The second general conclusion, therefore, is that the Universal Law of Location which states that something is everywhere below, on and above the Earth's surface is an effective, efficient, and directive means of analysing the data and evidence describing Ontario government positions and decisions on gridlock, congestion and removal of bike lanes.

J. Endnotes

1. The research design for [Universal Law of Location Supported by GIS as a Best Practice Element in Land Use Planning and Transportation Planning Decision Systems](#) includes case studies to test for utility. The first test case involved a pledge by Ottawa mayoral candidate and now Mayor Mark Sutcliffe to plant 1,000,000 trees in the current term (2022-2026). When the term neared the term half-point with little public knowledge about the state of Sutcliffe's pledge, and concerns were rising sharply about climate change disasters, that became the first case study of the University Law of Location.

[\(Universal Law of Location as a Land Use Planning Decision Tool: Analysis of Ottawa Mayor's Pledge to Plant 1,000,000 Trees\)](#)

2. My experience and the experiences shared by others is that in the transportation field it is often the case that appointed officials are not totally up to speed when it comes to education, training, and experience that involves research methodology for design purposes, and analytical skills in fields such as GIS, geography, statistics, mathematics, engineering, and computer science. It was hoped that I would be provided names of officials advising Minister Sarkaria and Premier Ford so that I might better understand the extent to which their pronouncements about gridlock, congestion, and removal of bike lanes are data-driven and evidence-based.
3. There is a Toronto-centric flavour to the vast majority of statements by Ford and Sarkaria that I encountered. An op-ed in the Ottawa Citizen might have introduced an inkling to Ford and Sarkaria that when it comes to notions about gridlock, congestion, and removal of bike lanes, one size does not fit all when the “one” is Toronto, a city about which both Ford and Sarkaria seem to obsess.
4. The terms “ad” and “advertisement” could be more accurate than “announcement” because no evidence has been found to substantiate the text, which appears to make it a governmental self-promotion message.
5. No emails were sent to MTO staff or to advisors because no names or email addresses were provided by Mr. Ford or Mr. Sarkaria. One consequence is that knowledge about Ontario government expertise on data and evidence to support positions on gridlock, congestion, and removal of bike lanes is limited to what can be gleaned from broadcast and social media stories involving politicians Ford and Sarkaria.
6. It was anticipated, and hoped for, that MTO and other officials would engage in discussions about data and evidence underlying the positions expressed by Ford and Sarkaria. The readings were selected accordingly so that we might have collegial discussions at the best practices level.
7. The **Urban Development Models** conference in 1967 was an early venue for expanding discussions about the limits to relieving motor vehicle traffic congestion by expanding road capacity, the need to integrate land use planning and transportation planning to better manage congestion, the increased use of mathematical and statistical models as part of urban development modelling, and increased emphasis on data-driven and evidence-based approaches to urban transportation policy formation and urban transportation planning.

Citation: George C. Hemmens, ed. **Urban Development Models**. Proceedings of a Conference. Special Report 97. Highway Research Board, Publication 1626. Washington, D.C., 1968.

8. I am aware that Mr. Ford had a stint as a councillor, City of Toronto. Review of public documents did not reveal to me any expertise on his part regarding any of the policy, program, plan, operations, or research aspects of gridlock, congestion, or bike lanes.

9. I often used the phrase “cone of silence” to describe the state of City of Ottawa councils when Jim Watson was mayor, and he and about 3/4 of councillors seemed to be joined at the lip in silence when citizens asked then questions about LRT contracts and other contentious matters. [Interim Report 28. Implications of the “New Gang” of Non-Respondent Councillors Ignoring Calls to Improve Trust, Transparency, Accountability, and Public Access to Public Records](#). Dedicated researchers are not dissuaded by politicians who try the silence ploy as a run and hide gimmick.

10. The heads up, then, is that due to their lack of expertise and practical experience in these matters, it is prudent to limit regard for statements by Minister Sarkaria or Premier Ford about **Bill 212, Reducing Gridlock, Saving You Time Act, 2024** (<https://www.ola.org/en/legislative-business/bills/parliament-43/session-1/bill-212>), and gridlock, congestion, or removal of bike lanes to their strictly political aspect.

11. In a media event Premier Ford used the term “hogwash” to express his position on cost estimates to remove bike lanes in Toronto. That is not a term that I use in my presentations, but given its suggested synonyms such as nonsense, garbage, nuts, rubbish, blah, stupidity, silliness, and drool courtesy of Oxford Dictionary and absurdity, asininity, bunkum, claptrap, crapola, crock, fatuity, and rubbish, courtesy of Merriam-Webster, “hogwash” appears to be a very good fit for claims about the incidence of gridlock.

12. Before proceeding with tests it is emphasized that they do not apply to the deemed fantasy notions of “gridlock” which appear in statements by Minister Sarkaria and Premier Ford, and in Bill 212. That said, if data and evidence demonstrating gridlock events are provided by Government of Ontario officials, then tests could be done to assess the utility of the Universal Law of Location as a transportation decision tool.

13. If the Government of Ontario has monitored the formation of gridlock events it is likely that it will have used a GIS capability to do so. I expect that many thousands of professionals in GIS, transportation, planning, engineering, etc., join me in wishing to see productions depicting these events in progress.

14. No images or graphics of gridlock events in Ontario have been encountered by me or any of my many contacts, and no one in the Ontario government has responded to any of my productions with images, graphics, or other kind of evidence of gridlock in Ontario cities.

15. In real-world terms, to put some substance on the bones of Bill 212 the Ontario government could put together a gridlock demo by locking down a 60-block by 60-block grid of streets, assembling many hundreds of private motor vehicles and their drivers, or driverless cars for that matter, and several dozen skilled individuals to drive the command-and-control function, and then start the cameras rolling on a contrived gridlock event.

16. Should the convoy mess in Ottawa in 2022 come to mind, it is recalled that the trucks were free to move out of downtown Ottawa at any time and were frequently invited to do so. The Ottawa situation was a blockade leading to congestion at the saturation level for several blocks, but several blocks are not a grid, they are just pieces of a stunt created to disrupt traffic flow and stage demonstrations.

17. Simulating gridlock with relaxed road rules is one thing. but doing it with real rules of the road for a real street layout in an Ontario city is quite something else.

18. A GIS capability is needed to monitor congestion-forming processes for data-driven and evidence-based decisions about perceived gridlock, and about bike lane installation and removal situations in Ontario cities. Perhaps as a result of this report MTO will make conference presentations on this topic, and will make materials available so that researchers can examine MTO methods, findings, claims, etc.

19. The Government of Ontario may be reluctant/may refuse to provide researchers and others the level of access needed to critically examine MTO files, and Ontario municipalities may be reluctant to vigorously pursue the access matter since they are creatures of the province. This issue may be pursued as part of the Information Board's research agenda.

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