



Sudbury Cyclists Union

March 28, 2014

Re: Route Planning Study, Highway 17 from Sudbury to Markstay and Highway 69 from the Estaire Road Interchange to Highway 17

The Sudbury Cyclists Union (SCU) has serious concerns about how the implementation of controlled access highways have affected cyclists in the Sudbury region.

We also have some specific concerns about the implementation of this project as it relates to the safety of cyclists.

The intent of all provincial roadwork is to improve the safety of its users. Traditionally, the focus has been on the safety of motorized traffic. The safety of pedestrians and cyclists has been long neglected on our highways.

On page 2.1 of your "Study Design Report", you note that to "promote a multimodal transportation network" is a key provincial responsibility" as is to "be a leader in road safety". The sole intent of implementing controlled access highways is to facilitate the safe movement of motorized traffic. While implementing such highways draws dangerous traffic away from more local routes that are used by cyclists, alternative safe and convenient routes for cyclists are often an afterthought and are not an integral part of the planning process.

An example is the Highway 69 corridor leading south from the City of Greater Sudbury that has been built without guaranteeing an alternative right of way for cyclists wishing to travel south. This controlled access highway has closed off access for non-motorized users to several towns and tourist areas, including the town of Killarney and the iconic Killarney Provincial Park.

In other provinces, in particular in Western Canada, major motor routes similar to our controlled highways have paved shoulders that are used by cyclists. In determining that controlled highways cannot be used by cyclists, and by not designing alternate designated cycling infrastructure as part of these projects, the Province of Ontario has ensured that much of its investments in provincial transportation in Northern Ontario exclude cyclist needs.

This current project is a case in point. Cycling needs have not been adequately addressed. This is interesting as the first aspiration goal of Ontario's Cycling Strategy is to be recognized as the best Canadian province for cycling and ranked among the top 10 jurisdictions worldwide for cycling.

On page 35 of the Transportation Study Report, section 4.2.8.2, you note that the Rainbow Routes Association "has indicated that active transportation (particularly cycling) is an extremely important activity in the Greater Sudbury area." The discussion that follows speaks primarily to the use of trails in the area. While recreational cycling is important, the majority of multi-use trails in the Sudbury area have not and will not meet the needs of commuting or touring cyclists unless they are paved, appropriately lit, and designed so they are safe and comfortable to use. A case in point is the Trans-Canada Trail that has been implemented on Highway 17 west of Sudbury. While the highway itself provides mostly flat travel for motor vehicles (hills have been blasted and

levelled), the trail has numerous steep slopes and a surface that does not accommodate touring bicycles (see pic below). In addition, the trail network can often lack connectivity which may only be addressed using municipal and provincial infrastructure.



Page 62 of the Study cites a social and cultural environment factor of “*Recreation/Trails, Cycling Routes, Public Facilities (OPP/Visitor Centres)*”. We are concerned that you have looked at cycling needs as a recreational concern only. On-road cycling infrastructure is important for both commuting and touring purposes. When designing roads, cycling should be a transportation mode that is integral to the design.

On page 100 of the Transportation Study Report, you have noted:

“Development along the future Highway 17 corridor will be limited by MTO’s corridor control to avoid additional private access points directly onto the highway for traffic safety reasons. Where required, new developments in proximity to the highway will require permits from the MTO.”

It is expected that there will be ongoing discussions with the City of Greater Sudbury and the Municipality of Markstay Warren regarding future ownership and maintenance of the existing Highway 17 when the new Highway 17 is constructed. Through these discussions, there may be additional opportunities to improve the character of the roadway adjacent to the existing communities and to improve pedestrian and cycling connectivity between Sudbury and Markstay.”

We are concerned that any development that is allowed along the new highway will not include an alternative access route to accommodate cyclists and will therefore be inaccessible to cyclists.

We also object to the Province constructing safe options for motorists but then suggesting that its responsibility for the current Highway 17 should be downloaded to the municipal levels without first addressing the lack of safe cycling options on this highway. If the responsibility of maintaining the existing Highway 17 is to be transferred to the municipalities, then the Province needs to upgrade the highway to include safe cycling infrastructure prior to the transfer. In Appendix C, Correspondence, in a response to the Sudbury and District Health Unit concerns, you “*Indicated that bicycles are currently not permitted on Highway 17; however, if a new alignment is recommended it is anticipated that sections of the existing Highway 17 alignment may remain as a secondary roadway which may be utilized for alternative transportation*”. Also, that “*Pedestrian and cyclist accommodation on future grade-separations and interchanges will be considered during the study.*” And, “*Noted that there is potential for a future Trans Canada Trail connection between Sudbury and North Bay.*” Contrary to your statement, bicycles are current permitted on Highway 17. In fact, Highway 17 is the only route that cyclists can use to travel between the City of Greater Sudbury’s core and Markstay.

We are also concerned with your language “*sections of the existing Highway 17 alignment may remain as a secondary roadway.*” This cannot be a “may”, it needs to be a “must”. Our experience with the Highway 69

controlled access highway implementation is that if left to the discretion of the Province, safe cycling options are eliminated and destroyed, thus making cycling impossible in certain areas of Ontario.

Also, we have not seen any cyclist accommodations on grade-separations and interchanges on your design maps.

Lastly, we assume that you view a Trans-Canada Trail connection between Sudbury and North Bay as a valid substitute for providing on-road infrastructure. We disagree.

We have no objections to the route that you have identified for the controlled access highway, but this implementation does in no way address the need for safe cycling routes between communities within the City of Greater Sudbury that are currently only connected by existing provincial highways.

You currently rate various sections of Highway 17 as operating at levels D and E (p. 1.16 of the Study Design Report). Building a controlled access highway to exclusively address the needs of motorized traffic will not alleviate the current danger to cyclists that exists on these corridors.

The current level of safety for cyclists along the existing Highway 17 corridor in particular is very low. Most sections do not contain paved shoulders, and while separating provincial traffic from local traffic will help with traffic volumes, there will still be a significant amount of local traffic on the existing corridor, especially during rush hour. The current state of the corridor is not only dangerous for cyclists who currently use the highway, but it also deters potential cyclists from using this mode of transportation.

Unless cycling options are built into the design for the controlled access highway, the current Highway 17 will remain as the only route that can be used by cyclists to travel between the City of Greater Sudbury's core and Markstay. This project will therefore not address the needs of local cycling commuters and provincial touring cyclists who wish to safely travel across Canada.

In closing, the Province of Ontario needs to provide assurances that cyclists will not be adversely affected by the implementation of controlled access highways and that it will ensure that alternative safe options are maintained or built to address cyclist needs as part of these projects, and this must be fully confirmed at this stage of development to ensure all users all left with well planned infrastructure. If the Province does not want cyclists on the lanes that it wants to reserve exclusively for motor vehicles, then it needs to provide options for cyclists. This could be cycling facilities that parallel the controlled access highway or nearby secondary roads that provide safe cycling infrastructure and that provide access to the same destinations as does the controlled access highway.

Also, the Province should not expect to transfer the responsibility of a sub-standard existing highway to the municipal level without first upgrading the Highway to ensure the safety of cyclists. Retrofitting a provincial highway that has not adequately met the needs of cyclists should not be the responsibility of a municipality.

Sincerely,

Rachelle Niemela
Chair, Sudbury Cyclists Union