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Comment On behalf of the Sudbury Cyclists Union (SCU) in Sudbury, Ontario, I am pleased to provide you with feedback to your Policy Proposal Notice for Supporting Cycling Skills Training.

Greater Sudbury was amalgamated in 2011 and is 3,267 square kilometres in area, making it geographically the largest municipality in Ontario and the second-largest in Canada. We only have a population of approximately 160,000 people (160,275 in the 2011 census). We therefore have a very low population density level (approximately 48 persons per square kilometre), with a tax base that must support a road network which includes over 3,500 kilometre lanes. We have very little existing on-road infrastructure with 14 lane kms of bike lanes, approx. 24 lane kms of paved shoulders, 1.2 lane kms of sharrows and a 700 m cycle track. A limited amount of sharrows and paved shoulders are being implemented in some 2014 construction projects, but these are not yet ready; some edgelines were also recently implemented one road, which is a quieter street with little on-street parking.

Greater Sudbury has a culture that is still very car-centric, although that is slowly changing as people move to Greater Sudbury from other communities that have an established cycling culture. As younger populations mature, older populations retire, students come to attend our university or one of our two community colleges, and young professionals move to our city, the focus on providing safe, affordable, and healthy sustainable transportation is slowly gaining ground.

Greater Sudbury currently has four previously-certified CAN-Bike instructors, and for the past five years, the Rainbow Routes Association and later the City of Greater Sudbury have offered a number of cycling courses, including Kids Learn to Ride, Adult Learn to Ride, CAN-Bike 1 (safe cycling skills for residential areas), CAN-Bike 2 (safe cycling skills for challenging traffic situations), and Cycling Freedom for Women (an adapted CAN-Bike 1 course taught by women for women). Two years ago, Rainbow Routes also funded some instructor training courses, which resulted in 6 graduating instructors (with all but one instructor being a member of the SCU). 2 instructors have since moved away.

Some courses have been successful, in particular the courses that have been offered to children, and courses that have been subsidized for some of the participants. Previous to 2014, the Rainbow Routes Association was the community organization that delivered cycling courses through a Trillium grant. In 2014, a collaborative of the Sudbury Cyclists Union, the Sudbury & District Health Unit, the City of Greater Sudbury and Rainbow Routes took over the delivery of courses. The City of Greater Sudbury is now providing administrative support, including registration of participants, paying an honorarium to the instructors, providing training facilities, and promoting the

courses.

Given the experience that we currently have over the past few years, we'd like to offer the following comments to your questions.

Are there additional factors that contribute to successful training in Ontario that MTO should consider?

In regards to the factors already identified:

- availability of training instructors: we have taken the approach that we would like to offer the CAN-Bike curriculum as it delivers nationally-recognized curriculum that is standard across Canada. That can be somewhat problematic as instructors must be certified in order to deliver the curriculum, and training to become an instructor is time-intensive. A more flexible approach may be needed in order to ensure the development of training instructors, all while balancing the integrity of the courses that are delivered.
- convenient scheduling and duration of courses: delivering the large amount of theory content as well as providing the onroad skills component results in the courses being anywhere between 12 to 18 hours in length. More flexible hours of delivery, perhaps combined with some online materials might offer more flexibility. We understand that CAN-Bike is currently revising its curriculum and is developing modules that are stepping stones for various certifications. We believe that this is a much more convenient approach for our population.
- availability of cycling training programs in communities of all sizes: the large geographical area that comprises Greater Sudbury creates a challenge as we balance accessibility within the outlying communities with the travel and setup that would be required for instructors. Our sense is that it will be important to build our instructors base that includes instructors that live in the outlying communities as well as in the city core.
- ability of training programs to address the needs of a diverse Ontario: Sudbury is a bilingual city with a large francophone population. Some 80.1% of the population speak English most often at home, followed by French at 16.3%. There are English, French and French immersion primary schools, as well as a bilingual university, one English community college and a French community college. It is important that we are able to deliver our courses in both languages. This is a challenge. The demographics of Sudbury do not yet warrant the requirement to look at delivering in other languages. There are also women in our community who have expressed an interest in cycling, as well as older adults who are retiring and now have the time to do more recreational cycling. We believe that delivering courses such as Cycling Freedom for Women will be an important direction to take in order to accommodate our special populations who are more comfortable in learning in an environment that is welcoming to them.
- public awareness of available training programs: there has been more interest in the past few years in cycling courses. Offering standardized courses across the province like CAN-Bike, with these courses being advertised in a more widespread and organized manner would certainly be beneficial. Leadership from the provincial government would be valuable, and possibly a partnership with CAN-Bike would be beneficial.

Are there additional factors that contribute to successful training in Ontario that MTO should consider?

Some of the following comments are hopefully being addressed as they are identified in the action plans for the #CycleON Strategy. We nevertheless wish to offer our experience in attempting to deliver safe cycling courses when the environment in which they are taught does not encourage safe cycling to being with. Not having an environment where all residents, organizations, and other municipal stakeholders understand and practice the skills that we are attempting to teach sets training courses up for failure.

Cost: it is important that cycling courses are accessible to all populations, including those cyclists who may not be able to afford the advertized costs of a course. We need to develop fee structures that will allow cost recovery for the courses, while still ensuring that they are accessible to everyone. We have received comments that if the City truly wants to encourage safe cycling, then it should offer the courses free to everyone.

The impact of safe cycling infrastructure: Providing cycling courses in a community that has very little safe cycling infrastructure can be daunting. Our city has not yet been able to address the demand for safer cycling infrastructure on our roads. There is interest in taking cycling courses, but many people perceive that it is dangerous to cycle in our city. For example, it is extremely difficult to teach cyclists that it is dangerous to cycle on sidewalks if they perceive that it is their only safe option. A strategic investment in cycling infrastructure must happen at the same time as offering safe cycling courses.

Municipal government commitment: roads and trail development are a municipal responsibility. The lack of consistent cycling infrastructure standards that municipalities apply to roads projects can be a detriment to encouraging cycling in cities. Having standardized Complete Streets policies and Transportation Demand Management strategies that all cities use would demonstrate that our governments are serious about safe cycling. If the public sees that an integrated approach is being made to provide safe cycling opportunities, they will be more likely to want to take up cycling and more likely to want to learn how to do it properly.

Providing the same message: Our experience is that not all police officers or services necessarily understand or interpret the Highway Traffic Act in the same way. Changes are coming with the proposed Bill 31 – the Safer Roads Ontario Act. Using these changes to inform and train all police services on the correct interpretation of the HTA would ensure that police officers who inform citizens of safe cycling practices are providing the same messages as those who teach safe cycling courses. For example, our experience is that there is sometimes a difference of opinion when it comes to the phrase “as close to the side of the road as practicable.” We would like to see the province take leadership in developing safe cycling videos that correctly interpret the provisions of the HTA that relate to cyclists. Standardized instruction should also be provided by driver’s education courses – we have heard of some instructors in Greater Sudbury who do not understand the rights of cyclists on the road, and are teaching new drivers incorrect information. We have also had some serious issues with some local trucking companies who clearly do not understand that cyclists are a vehicle under the Highway Traffic Act and that they have a right to be on the road. It is very difficult to teach safe cycling skills within the context of the HTA, when police services, driver training companies, trucking companies and the driving public in general do not understand or follow the rules that we are teaching cyclists. There needs to be a more concentrated effort to ensure that everyone is providing the same messages that we are providing to new or to nervous cyclists.

Instruction for children: it is our belief that all children attending primary school should be receiving standard cycling safety instruction as part of the required curriculum. The experience in other countries has been that children who are safe cyclists grow up to be safe automobile drivers. A provincial initiative to offer this instruction in all primary schools should be implemented to complement the instruction that is offered to older children and to adults by providers like municipalities and community-based organizations.

Enforcement of infractions: There needs to be better enforcement of cyclist and of automobile driver infractions, in particular those that can be life-threatening. It is unfortunate that some individuals will only comply when they are charged, but teaching the rules of the road is only one aspect of ensuring that we create an environment where all road users are safe and comfortable on the road.

How can cycling education/training be made more convenient (e.g. time involved and locations it is offered) and responsive to the diverse needs of Ontario's communities?

As mentioned above, standardized curriculum and courses targeted to children, youth, adults and specialized populations would ensure that the same information is consistently being delivered to all Ontarians. The centralized development of curriculum in different languages would alleviate the requirement for each city or area to develop materials in different languages. The development of standardized videos and online modules would assist in providing instruction that can be delivered within an in-person and online format. Providing stand-alone modules that can be repeated regularly throughout the cycling season would allow us to provide flexibility of delivery times for people who cannot commit to large chunks of time over a weekend, or even over the course of a week.

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