



Sudbury Cyclists Union

June 26, 2015

Re: City of Greater Sudbury Draft Transportation Study

On Wednesday, June 24, the Sudbury Cyclists Union (SCU) had the opportunity to provide a 5-minute presentation to City Council in regards to the Draft Transportation Study. As well, as a representative on the Sustainable Mobility Advisory Panel (SMAP), the Chair of the SCU was provided with an excellent opportunity to dialogue with MMM Group and with City Staff in a review of the report. That meeting lasted almost an hour and a half. These were very productive and we thank Council for these opportunities.

We would like to provide a follow up to the presentation that we provided to Council on the evening of June 24, with some comments about what was presented as well as some additional comments about process.

The Draft Transportation Study is a 214-page document that is very technical in nature. It also includes a 73-page Appendices document. An SCU working group met several times to discuss the document in hopes of preparing a good response for the Council meeting. However, we had so many questions about its contents that we had great difficulty in preparing a presentation. We received many answers to some of our critical questions at the SMAP meeting and the public input center that ran from 4 – 7 p.m. on June 24.

However, both of these opportunities were scheduled just prior to the Council session. This left us with very little time to fine-tune our presentation and no time to consult with the members of the working group.

As a result, we'd like to provide some clarify on what we presented to Council. As noted at the Council meeting, our comments relate specifically to cycling. However, we'd like to note that many of our working group members had concerns about other areas covered in the document, in particular about process, timeframe and scope of the report.

After the clarifications that we received, it became very clear that the document in many cases doesn't clearly explain what was intended. A more consultative and iterative process during the development of the document would have gone a long way to mitigating the confusion that we had over its contents.

Complete Streets

It is excellent that Complete Streets is an underlying framework moving forward. While there have been many comments that Complete Streets principles have been used in roads projects for many years, almost all of the construction projects that were done within the last 10 years did not include cycling infrastructure. Some traffic calming projects even resulted in impediments to safe cycling (Attlee curb extensions). We therefore feel that having a good official policy that must be followed when planning, constructing, and maintaining roads is critical to ensuring the safety of all cyclists.

There are more people using their bike on our roads, and this travel mode share is sure to grow, even without active encouragement. Unfortunately, most cyclists are using the sidewalk on major roads – a sure sign that safe cycling infrastructure is sorely needed on our most dangerous roads.

That is why it is critical that we have a good Complete Streets policy that incorporates the 10 elements suggested by Complete Streets Canada, and that will mandate a Complete Streets review of all road projects and programs.

We were told by City staff that they would like to see a Complete Streets policy developed within 2-3 years. We recommend that this policy be developed as a priority and that we have it in place in order to use it as a lens for all proposed 2016 road projects. MMM Group told SMAP that they have developed many Complete Streets policies, including policies that incorporate the 10 elements.

We also would like to see an accompanying Complete Streets Guidelines, similar to the guidelines that were prepared by Calgary in 2014:

http://www.calgary.ca/_layouts/cocis/DirectDownload.aspx?target=http%3a%2f%2fwww.calgary.ca%2fTransportation%2fTP%2fDocuments%2fCTP2010%2fcomplete-streets-guide-2014-web.pdf&noredirect=1&sf=1

MMM Group told SMAP that they are developing such guidelines for the City of Toronto, and when asked how long it would take to prepare something for Greater Sudbury, they responded with a timeframe of less than a year.

As well, within the context of Complete Streets, we would like to suggest that we develop road Levels of Service that incorporate all modes of travel (not just cars) when rating roads. Doing this may significantly change our road project priorities. Projects that provide safe infrastructure for pedestrians and cyclists – our most vulnerable road users - should be just as high if not a higher priority than projects that target only car-driver comfort (traffic volume and flow). Safety should be our number one priority and we should implement a “Vision Zero” approach towards eliminating traffic injuries and fatalities.

SCU recommended changes to the Transportation Study:

Make the following recommendations:

- Implement a Council-approved Complete Streets Policy in time for the 2016 capital budget process
- Implement Complete Streets Guidelines by spring 2017
- Implement new road Levels of Service that incorporate all modes of travels by spring 2016

Road Classifications and Design Standards

We’re pleased to see all modes of transportation in the new road classifications and design standards. The Study recommends the adoption of a Road Classifications policy.

We do have a concern that these great strategies will only be implemented on new roads. A strategy needs to be developed to review all existing roads, apply the classifications, and prepare a plan to address and retrofit all major deficiencies.

Our major deficiencies are our arterial and collector roads. These are roads where we see the most people bike on the sidewalks. Not because they want to break the law, but because they don't feel safe on these roads.

We need to have a safe road "priority index" that identifies those roads that are the highest retrofit priority in order to provide safe, direct, and comfortable cycling infrastructure. This strategy should be the guiding principle for our active transportation network phasing.

We also would like to see additional cycling design standards for arteries and collector roads, in addition to the AADT that is currently proposed in the Proposed Road Classifications chart on p. 188. The City should specify that it will use the Ontario Traffic Manual Book 18: Cycling Facilities Facility Type Selection Tool, which evaluates not only traffic volume, but other considerations including topography, vehicular speed, vehicle mix, and others.

SCU recommended changes to the Transportation Study:

- Clarify that the road classifications and design standards will apply to all new roads as well as retrofitting all existing roads.
- As part of the Active Transportation Plan, recommend a strategy to evaluate all existing roads and use the corresponding index to prioritize retrofit projects.
- In the final Road Classifications policy, identify both in words and in the chart that additional evaluation components as per Book 18 will be used to identify the potential cycling provisions.

Active Transportation Plan

We are pleased that a plan is being proposed, as it's been long awaited. We do feel that there should be a more in-depth plan, complete with long-term goals and strategies, annual project priorities, timelines, and budget.

In particular, the current recommendations, priorities and timeframes do not reflect Council's support of cycling in the form of annual dedicated cycling dollars.

We also have concerns that the current priorities and network phasing will mean that we will not have a minimum grid of safe, connected, and comfortable cycling infrastructure in place by 2031. If our goal is that we want to implement the proposed network, then we need to make it happen.

We recognize that the level of detail that we are proposing does not belong in a Transportation Master Plan, so we suggest that Section 8: Cycling and Pedestrian Plan be included as a recommendation only, and that a more complete Active Transportation Plan be prepared in consultation with SMAP and with the general public.

We were told at the SMAP meeting that the network maps are only recommendations at this point, and that doing a feasibility study, and in particular costing, for all of the proposed infrastructure could be very time-intensive and costly.

We heard a recommendation that this be done on a project by project basis. Yet how can we formally adopted a plan that includes priorities and network phasing if there are still to be feasibility studies on its recommended active transportation infrastructure?

We also have some concerns about some of the recommended cycling infrastructure on the maps. In some cases, the proposed infrastructure does not meet the design standards proposed in the Draft Transportation Study. In other cases, there is no infrastructure on some sections of major connecting arterials and collector roads. As the proposed network infrastructure was developed a few years ago, we need a more recent in-depth rationale as to why certain infrastructure is being proposed, or not proposed, before we can move forward with identifying priorities.

Of greatest concern is that there are no significant cycling infrastructure projects identified for 2015. The cycling community has been waiting for years for a plan that will guide the City of Greater Sudbury in building safer roads for cyclists. Moving forward, we would like to see high-priority cycling projects on arterial and collector roads on the annual list of capital road projects. In particular, we want to see some projects listed on the 2016 capital project list.

In summary, in order to have a good implementation of safe cycling infrastructure, we need to have a more complete Active Transportation Plan that contains a prioritized list and preliminary costing to retrofit the roads that are most dangerous to our most vulnerable road users.

While that is being prepared, we ask that the City work with SMAP to identify and prioritize a few projects that we can begin constructing in 2016.

SCU recommended changes to the Transportation Study:

- Change the network phasing recommendations to address the most dangerous roads first instead of dealing with them in the 10+ years timeframe.
- Recommend the development of a more complete Active Transportation Plan in coordination with SMAP and the general public by spring 2016.
- Identify that Section 8 is a recommended approach, and not the final plan.
- Identify that the City of Greater Sudbury will work with SMAP in the interim to identify priority projects that can be planned for the 2016 capital budget process.
- Recommend hiring, contracting or assigning an individual as soon as possible to coordinate moving the Transportation Master Plan and the Active Transportation Plan forward, to act as Active Transportation Coordinator, and to work on Transportation Demand Management.

Transportation Demand Management (TDM)

Transportation Demand Management (TDM) is mentioned twice in the document, which is at least an acknowledgement that we need to incorporate TDM into our planning processes. However, there needs to be a concerted effort to formally implement TDM at both the planning and program level.

It's of great concern that TDM was not included in the development of the Sustainability Focused Option. When MMM Group was asked why a modal split of 2% for transit and active transportation was used in calculating future road network traffic volumes and network capacity, the consultants were unable to answer the question. More recent references in other City reports speak to transit modal splits of 4-5%. The model that was used

therefore does not properly factor in transit and TDM goals and strategies, which aim to minimize single-passenger car trips.

MMM Group informed us that even with increased modal shares in the model, the outcomes may not be significantly different. However, we are concerned that an incorrect model may result in new roads and more road widening projects than are actually needed. There needs to be a shift in subsidizing single-passenger car trips to subsidizing strategies that will allow less costly movement of more people, including transit and active transportation.

SCU recommended changes to the Transportation Study:

- Recommend the implementation of a Transportation Demand Management strategy and plan.
- Run additional scenarios in the Sustainability Focused Option to reflect increased transit and AT modal shares to see if the outcomes remain the same.
- Recommend caution in developing new roads and widening existing roads until a full evaluation can be done that includes TDM goals and strategies.

Suggested Changes to the Official Plan

Some proposed changes to the Official Plan in Section 11: Transportation are problematic. We would urge no formal adoption of the proposed changes until we see some key issues with the Draft Transportation Study addressed.

SCU recommended changes to the Transportation Study:

- The wording as recommended in Appendix I should be reviewed with SMAP and the general public in order to ensure that the Official Plan reflects the goals of a good Transportation Master Plan as well as the vision and goals of Council.

Process

Lastly, we understand that additional comments are now being taken only until today (June 26) before a revised plan is provided to Council. There has been great confusion around the timing and review phases of the Draft Transportation Study. As a result, the SCU working group will not be able to meet to review and finalize the comments we are submitting. We will have to rely on email communications today, and the guidance of the Chair. This is not a good way to provide inclusivity into the process. Advance notice of the due date would have allowed us to better refine this submission and to ensure that all of our working group's concerns were addressed.

Moving forward, we need to do better in informing everyone on the process and timeframes. Our City's website should provide more in-depth information on the project scope and timelines, and a better communication strategy needs to be developed for these kinds of critical projects.

There also needs to be more opportunities to get answers to questions. It is unrealistic to expect that the City can get good feedback if we ask citizens to submit comments within a very short timeframe on an extensive and

complicated plan they've never seen before. And without them having ample opportunity to ask clarifying questions before they submit their comments.

SCU recommended changes to the Transportation Study:

When preparing the revision:

- Provide a high-level executive summary of which changes have been done in regards to goals, strategies, policies, and direction.
- Provide a “change document” that clearly identifies exactly what has been changed on each page.
- Provide a document that identifies all community responses and how those responses and/or recommendations have been reflected in the new document. If they are not reflected, provide a rationale as to why they were not included.

The SCU looks forward to working with the City of Greater Sudbury on developing a great Active Transportation network for all cyclists.

Sincerely,

Rachelle Niemela
Chair, Sudbury Cyclists Union