

January 26, 2013

Sudbury Cyclists Union
Sudbury, Ontario



Dear MTO Policy Officer Michael Deruyter

Re: EBR # 011- 7552

Thank you for providing an opportunity to comment on the Ontario Ministry of Transportations *Draft Ontario Cycling Strategy*.

The Sudbury Cyclists Union (SCU) is a grassroots organization whose main focus is to provide a strong unified voice for cyclists and to facilitate a better cycling culture in the City of Greater Sudbury. Our aim is to make cycling safe, accessible, and fun for cyclists of all ages and ability.

Our mandate fits in very well with the vision of the Ministry as outlined in the *Draft Strategy*, that being an *Ontario-wide vision for a safe cycling network that connects the province, for collision rates and injuries to continue to drop, and for everyone from the occasional user to the daily commuter to feel safe when they get on a bicycle in Ontario*.

We are especially happy to see that the *Strategy* attempts to address the recommendations from the Chief Coroner of Ontario's *Cycling Death Review*. While we've been lucky that there have been only very few cycling fatalities in Sudbury over the last few years, we nevertheless continue to see too many cycling accidents could be prevented.

While many of our SCU members have travelled and cycled extensively both in Canada and in other countries, our major concerns relate to the cycling environment in Sudbury and Northern Ontario. Accordingly, you will see that many of our comments and recommendation reflect the current cycling conditions in this area. We hope that concrete implementations of your *Strategy* will make changes here and in the North – changes that will make for a safer environment and a better experience for cyclists in this region of Ontario. Our aim is to have safe cycling networks within the city boundaries, and safe linkages to provincial and other destinations for both transportation and recreational purposes for cyclists of all ages.

We fully support the benefits outlined in the *Strategy*, and are anxious to see how its implementation will result in cycling enhancements that have been sorely lacking in Sudbury to date. Our city needs to invest in healthy activities to decrease our significantly higher blood pressure, arthritis and obesity rates as compared to provincial and national averages (Sudbury's *Vital Signs 2012* report, Health and Wellness section). We are now experiencing gridlock in many areas of our city, and we believe that monies would be better spent in active transportation strategies to reduce congestion, rather than spending taxpayer dollars on building and expanding more roads. As a "green" organization, we support the reduction of greenhouse gases, in particular those of vehicles, and welcome cleaner air in our cities. And lastly, as a city that offers many outdoor recreational opportunities, we believe that investing in safe cycling infrastructure will greatly help our tourism industry.

As such, we respectfully offer the following comments on your document:

General Comments

Because the Ministry has not updated its *Bicycle Policy* since 1992, we are pleased to see the Ministry begin work on a new strategic document. We applaud your seeking input from all Ontario citizens. The SCU supports the initiatives that are described in the Context section, and we very much agree with the three-pronged approach described in Section 2. We also support the goals identified within each approach (we see goals as the subtitles under each strategy i.e. “Leading the Identification of a Province-Wide Cycling Network”).

We do, however, have some concerns about the descriptions of the actual goals as proposed in section 2. Nothing in this section links to budget allocations and timeframes, nor should it necessarily do so if the goal of the document is to guide the development of the programming that will implement the described strategies and goals.

The inclusion, wording and specific descriptions of some of the programming that is identified imply that the Ministry will limit the implementation of each strategy to the listed and existing programming practices.

The use of the words *enshrining this approach* on page 8 is important as it mandates the proposed strategies and we agree that this should be case; but the strategies shouldn’t be limited to only the items listed within the document. Doing so limits the scope of the overall strategy as well as its lifespan.

We believe that, rather than describing specific programs, the one critical outcome of the document should be to mandate the development, implementation, and cyclical review of a comprehensive *Ontario Cycling Plan*, as referenced by the *Cycling Death Review*. Page 8’s footnote number 4 in the *Strategy* states: *Developing the Cycling Strategy addresses recommendation 2 from the Coroner’s Report* (p. 8). This is only partially correct as the Coroner’s report recommends a complete *Ontario Cycling Plan*. Such a plan would include achievable and measurable deliverables that would implement the Ministry’s strategy. Similar to *Official Plan* cycles for cities, we propose that mandatory reviews of the *Plan* be done every 5 years, including a “report card” on identified deliverables.

Also, all documents moving forward need to eliminate wording that has nebulous and non-proactive implications like *should* and *may* and *consider*, and replace them with pro-active, binding words of compliance.

Our next comments address specific issues and programs that are mentioned in the *Strategy*, and that we believe should be carried forward into a comprehensive *Ontario Cycling Plan*. We wish to comment with an acknowledged bias as to how the *Strategy* will impact Northern Ontario, and more specifically, the City of Greater Sudbury.

Infrastructure

As citizens of Northern Ontario, we have active transportation needs that we share with Southern Ontario and the rest of Canada, but we have some unique transportation needs as well. We are the largest city in Northern Ontario by population (over 160,000) and the 24th largest metropolitan area in Canada. In land area, it is the largest city in Ontario (over 3,627 square kilometres), the seventh largest municipality by area in Canada and the largest municipality in English Canada legally designated as a city. Our road network extends over 3,560 lane kilometres to link sparsely populated and urban areas. This physical configuration creates unique challenges in developing a good active transportation network that services all of our citizens.

While we have some off-road recreational multi-use trails, we currently have very little municipal cycling network infrastructure. In most situations, cyclists must travel on heavily used arteries in order to get from one end of the city to another.

Many of our citizens refuse to look at cycling as an option for transportation in Sudbury, because they fear for their safety on our roads. This needs to change in order to achieve the goals that are outlined in your *Sustainability InSight* framework.

Unlike other metropolitan cities, our municipal government has not been very proactive in developing active transportation infrastructure. There are policy reviews taking place (our Official Plan and its accompanying Transportation Network reviews), and some projects are planned which will include multi-use active transportation corridors (the Elgin Street Greenway). However, we lack active long-term transportation implementation plans, and the 2013 budget does not include distinct allocations for active transportation development.

We believe that the province can provide a critical role in developing standards, best practices, grants and programmes that would both mandate and encourage active transportation development by municipalities like ours.

It is laudable that the Ministry has invested many dollars in expanding cycling infrastructure in Southern Ontario (i.e. the Big Move). However, we in the North are very much behind Southern Ontario because there have been very few dollars allocated to our area of the province, Manitoulin Island notwithstanding. We have some significant retrofit challenges in bringing our city and our region up to par with other Canadian cities. The Ministry can help by assist with funding targeted to Northern Ontario, and with policies that mandate the inclusion of cycling infrastructure whenever a road is built or rehabilitated.

We find the wording in section 2.1 *Enhancing Cycling Infrastructure in the Province* limiting as it targets recreational cycling as the main goal for developing cycling infrastructure. Identifying the need for a cycling network only as it relates to recreational cycling and tourism opportunities ignores the fact that cycling is a viable transportation option. Developing cycling networks, especially in coordination with public transit (including buses and trains), not only addresses tourism, but also implements alternative modes of transportation for travelling to and from school, work, shopping areas, for personal errands, and for other travel reasons not related to recreation.

The sentence *it will evaluate on a case-by-case basis whether the addition of a cycling component is warranted based on outlined criteria and whether it can be accommodated without substantially altering the scope of the project*, is also problematic for us. These are the same types of words that we see in many municipal planning documents and that have historically been used to negate the inclusion of cycling infrastructure in road building/rehabilitation projects. It is our position that accommodating cycling should be mandatory for *all* projects, in other words, a Complete Streets approach for all roads, as recommended by the Chief Coroner. It is not to say that complex implementations are needed for every project; the priorities that are listed by the Ministry should drive the *type* of implementation. While cost is listed as the last priority item, we have found that too often, it is the determining factor that is used to eliminate cycling infrastructure in new projects.

We therefore support a standard of the *minimum* one meter shoulder for *all* provincial roads. Some of our members have personally travelled on your Manitoulin Island pilot project, and it is so much more pleasant, comfortable and safe to travel there than on most of the roads in the Sudbury region. The Manitoulin Island

roads, where there are few large trucks and traffic is not extremely busy, mimics many of the roads close to Sudbury. Its pilot should be deemed a success and monies allocated to others pilots in Northern Ontario.

There are other situations, however, that warrant wider shoulders because of traffic type and density. We are a centre hub in Northern Ontario, with Highway 69 going south and, Highway 17 (the Trans-Canada Highway) going east and west, and Highway 144 going north. Because these are critical transportation routes for moving goods across Ontario and Canada, there are significantly large numbers of trucks that travel these highways. If we are to encourage a cycling network across Ontario, the MTO needs to incorporate cycling infrastructure on these highways, or alternative options that are pleasant, safe, and direct. We do not have the network of secondary roads that Southern Ontario enjoys, and asking cyclists to travel significant distances to avoid dangerously busy highways will only discourage cycling in Northern Ontario. Wider paved shoulders on the four main highways leading to and from Sudbury would be very beneficial to cycling in this region. Some sections, because of extremely busy traffic, may also warrant separated bicycle paths, or the continued maintenance of parallel secondary roads when newer, more volume-intense highways are built.

The last is clearly exemplified by the challenges cyclists now face with the four-laning of Highway 69. Its reconfiguration to a freeway has closed some of this road to cyclists. Currently, cyclists wishing to travel south to Killarney or to the French River have no options to get there. The Ministry has proposed travelling on a significant detour which includes dangerous sections of Highway 17 east in order to get to the French River, but that leaves out the Killarney area. In Southern Ontario, secondary route alternatives to freeways are in place. Such is not the case in Sudbury. We would ask that the government retrofit existing sections of the new Highway to accommodate cyclists and incorporate cycling infrastructure as newer sections are developed to Parry Sound.

In summary, we recommend the development of a set of standard implementations for all provincial roads that will be developed in coordination with the cycling community. These standards should be based on traffic types and volumes, road configuration (hills, curves, exits, entrances to driveways and business access, etc.), and user need (only road allowing access to areas, larger volumes of cyclists, etc.). Our hope is that the new *Traffic Manual Book 18* will provide guidelines that we can review and that there will be opportunity to provide input before the guidelines are put into place.

Examples like Quebec and some U.S. states who have adopted state-wide implementations of Complete Streets show that provincial-level leadership is critical to establishing cycling infrastructure in all areas of the province. Working with partnerships, under clear guiding principles, with other entities like the Trans Canada Trail, the Share the Road Coalition, 8-80 Cities, the Complete Streets Coalition, Ontario municipalities, Health Units, and grassroots organizations is critical. The Ministry can be proactive and visionary by taking a leadership role in coordinating across jurisdictions and in eliminating barriers to establishing a comprehensive cycling infrastructure that serves all Ontario citizens.

Safety

As cyclists who see numerous dangerous situations as we travel on Sudbury roads, we applaud your strategies for educating both cyclists and motorists. Sudbury has a decided anti-cyclist culture. The SCU is hoping to change some of that. We now have members who are CAN-BIKE instructors, and we are planning to provide CAN-BIKE courses to citizens starting next year. This past year, our members have provided bike safety training at festivals and events, as well as in some primary schools. We actively promote safe cycling to all cyclists whenever we see an opportunity to do so.

There is however, a lot of work still to be done to encourage safe sharing of the road.

We applaud the changes to the Driver Handbooks, and the New Beginner Driver Education curriculum. We have in the past heard some disturbing stories about driving school instructors having anti-cycling opinions in Sudbury, and would ask you to expedite all proposed changes. We would also recommend sensitization campaigns, to be conducted provincially, as well as dialogues established with driving schools to ensure that the right message is being communicated to new drivers.

We would like to see additional signage on roads, targeting both cyclists and motorists. Properly informing cyclists of choices for routes, safe navigation of exits (especially road merges), and lane options are critical to cyclist safety. Informing motorists to share the road with cyclists, and informing them of the likely behaviour of cyclists based on the oncoming road conditions (curves, merges, etc.) is also critical. We would also like to see enforcement of posted speed limits on all roads that are used by cyclists; if the speed limit is 60 or 80 kms an hour, then enforcement should be at that level, and not 10 kms over the posted speed limit as is currently accepted by motorists. We also support changes to the Highway Traffic Act which would allow municipalities to lower the speed limits on residential streets from the current 50 km/hr. This would help cyclists as well as pedestrians who need safer streets.

It is important that roads be maintained properly, especially as paved shoulders become available for cyclists. Snow in the winter needs to be cleared properly as some cyclists do cycle in the winter. Roads need to be repaired promptly, including paved shoulders, in order to ensure the safety of cyclists who do not have the option of easily swerving on heavily travelled roads.

We are encouraged to see that you will continue to support funding for safety programmes, and hope to see some of these initiatives implemented in Sudbury. Developing partnerships with municipalities, local police forces, local health units, and community groups is critical to implementing safety programmes. Sudbury does not yet have any such programs in place. Sudbury would greatly benefit from programs like Bike to School, Bike to Work, and the Road Safety Challenge. Safety programs targeted specifically to the trucking industry and to industries that employ their own truck drivers are important to Sudbury, as we see a large number of trucks on our municipal and provincial roads.

Programs targeting children are especially important; as experienced in countries like the Netherlands, children who learn how to cycle safely become life-long cyclists, and also become safer automobile drivers. We would like to see the development of cycling education in primary and secondary school curriculums, and hope you continue to fund partnership initiatives with organizations like municipalities, police forces, and others, that ensure that all Ontario citizens have access to safe cycling education.

We've long thought that point of sale safety information should be mandatory for those retailers and individuals selling bicycles. We believe that they should also go a step further; it should be mandatory that a bell, light, and reflective tape be included in the purchase of a new or used bicycle, and in particular adult bicycles. These items are mandated by law, and not all citizens are aware of this. It should be the responsibility of the seller to provide a product that conforms to the law and that encourages safe use. In order to encourage the retrofit of existing bicycles, the SCU would like to see retrofit programs offered to citizens, in particular targeting lower-income families who would not normally have the means to purchase the additional items.

There are a few initiatives that we would like to see developed in addition to the ones mentioned above, including that of a one meter passing rule for vehicles when passing cyclists. After implementation, promotion campaigns would be critical to informing the public of changes to the Highway Traffic Act. It is to be noted that drivers who achieve competency in driving, and then receive a license, are never retested (until they are 80 years of age), nor is there a system in place to notify them of changes to driving statutes. It is also not mandatory for all drivers to take driver's education as a prerequisite to receiving a license. We

would like to suggest that this be put into place, and that a review be undertaken to identify the best methodologies to ensure that all drivers keep up to date with their skills as well as their legal obligations while sharing the road.

Because we have CAN-BIKE instructors in Sudbury, we recognize the value of the CAN-BIKE program as it is the only accredited cycling education program in the country. Under the law, bicycles are treated as vehicles. They share the road with much heavier automobiles and trucks, and are therefore more vulnerable users of the road. Yet in many communities, there are no options for users to take training on how to properly and safely use a bicycle in urban and high-traffic areas. Funding needs to be identified in order to support the central development of CAN-BIKE programs through its parent organization Cycling Canada Cyclisme; to develop additional instructors; and to help in implementing the program in all Ontario communities.

Lastly, the *Cycling Death Review* recommends the mandatory use of helmets. This recommendation has unfortunately polarized the cycling community, as some cyclists refuse to wear helmets, while others support the recommendation. Nay-sayers cite freedom of choice, as well as examples of other countries that do not mandate helmets. Helmets, however, do save lives, and minimize head injuries. And Ontario's lacking cycling infrastructure makes cycling, in our opinion, more dangerous here than in other countries where infrastructure abounds. The majority of SCU members support the use of helmets, so we would urge the Ministry to seriously consider implementing this law.

Planning

We are looking forward to the new Traffic Manual Book 18. We believe that this type of reference document, that has long been available in other provinces like Quebec (example Velo Quebec's *Planning and Design for Pedestrians and Cyclists – A Technical Guide*), needs to drive the planning and development of infrastructure across Ontario. The standards would ensure that all municipalities follow best practices and implement road infrastructure that is cost-effective and sustainable.

We would encourage Ontario to adopt, province-wide, the Complete Streets approach to road design. This approach has been widely adopted in the United States, including a U.S. Department of Transportation policy statement, and the presentation in 2011 of the Safe and Complete Streets Act in the U.S. Legislature. The United States now has over 300 jurisdictions that have adopted the policies as of February 2012.

While some Ontario cities like Kitchener have endorsed Complete Streets, Calgary is still the only city in Canada that has fully implemented the approach.

Complete Streets is mentioned in Sudbury's Sustainable Mobility Plan (SMP) where it is recommended that the City develops an official policy. The SMP was published in spring 2010, and almost three years later, there has been no adoption of Complete Streets by the city.

We believe that Complete Streets should be adopted across Canada, and that the Province of Ontario should lead above all other provinces by implementing the approach at a provincial level, as recommended by the Coroner of Ontario. This would greatly benefit all citizens of Ontario, no matter where they live.

Research

The SCU supports the implementation of provincial cycling networks. We are participating in suggested designs for some Northern networks, including the Georgian Bay Cycling Route and the Lake Huron North Channel Cycling Route. It is important that the Ministry continue to involve stakeholders who actively use

existing on- and off-roads across the province. It is also important that the Routes be implemented in the best way possible, from both an economic and best use perspective. Implementation of well-planned and optimized Routes will generate tourism dollars, encourage motorists to explore alternative modes of transportation, and build healthier lifestyles.

Summary

In summary, the SCU supports your outlined strategies, and we suggest that the Ministry develop an *Ontario Cycling Plan* to plan the implementation of the following:

- A complete plan and funding to implement well planned and coordinated cycling networks that safely link all Ontario communities, for both recreational and transportation purposes. In the North, there are often no other viable routes other than major highways for travel between communities. It is important that a Northern implementation include a two-prong approach to active transportation: retrofit of existing highways, and development of more pleasant alternative routes. This would include a minimum one-meter wide paved shoulder on all provincial highways.
- Changes to the Highway Traffic Act that implement: allowing cyclists to travel on paved shoulders; a one-meter passing rule for vehicles when passing cyclists; mandatory helmets for all Ontario citizens; and the change of residential speed limits to allow 40 km/hr on those streets.
- Existing and additional funding to municipalities for the development of standardized cycling infrastructure within the municipalities.
- Comprehensive, province-wide public education for cyclists and drivers, including funding for CAN-BIKE; cycling education in primary and secondary schools; mandatory driver's education courses for all individuals wanting to drive; re-education of existing drivers; province-wide public relations campaigns; and education for purchasers of new and used bicycles.
- Funding for research, including effects of changes, statistics and trends.
- A pro-active leadership role by mandating provincial standards for cycling infrastructure.
- Coordination with other ministries, local government, and cycling stakeholders. It has been our experience that implementation of cycling infrastructure has not been done with adequate stakeholder input. Involving Regional Tourism Organizations, advisory panels, organizations, grassroots organizations, and individual cyclists who use the infrastructure will ensure that the right implementations are done the first time around.

We thank you for the proposed strategy, and anxiously await the implementation plans that will turn your vision into reality.

Sincerely,

The Sudbury Cyclists Union