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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 the Development of the Ontario Municipal Cycling Infrastructure Program.

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.

The SCU's main concern is the safety of cyclists who have no other options but to use roads that are dangerous to us.

As with many Northern Ontario cities, we do not have a concentrated grid of streets that would offer parallel travel options to the arteries which are the main connectors within our city core and to our outlying communities. Some of these arteries are marked at 60 and 80 km/hr, but actual travel speeds by motorized traffic usually exceeds these limits. We also have challenges with the number of large trucks that travel along designated truck routes that go through the city core; many of these truck routes are in high-density areas which house residents, businesses, and sometimes schools.

As of yet, we do not have a Complete Streets policy, nor do we have transportation demand management strategies and programs. We do not have a Cycling Strategy, nor do we have a capital projects lists that contains projects to implement a safer cycling infrastructure grid on our existing roads.

Sudbury has many trails that go through the City, and our population greatly supports the need for more trails. In our 2014 Parks, Open Spaces & Leisure Survey, respondents said that: 53% of households cycle; 91% consider trails and cycling pathways important. The issue with our trails is that very few are paved, therefore often providing challenging surfaces for some cyclists, especially during spring and rainy times of the year; they are not lit, which is a safety concern for cyclists who wish to travel to destinations in the dark; they are not plowed in the winter; and they are often not connected to any other cycling infrastructure, therefore making it challenging to cyclists

to safely travel to destinations where they want to go.

As part of our Official Plan Review which began 3 years ago, a Transportation Study was commissioned but the City of Greater Sudbury has not yet released the results. Part of the results are supposed to provide us with a plan to implement an Active Transportation Network, but the actual final details and recommendations are unknown.

The SCU recommends certain priorities when prioritizing which cycling infrastructures should be built in Greater Sudbury:

- The infrastructure should address the 8-80 principle which addresses the needs of cyclists of all ages
- The infrastructure should address cyclists of all skills and comfort levels eg strong and fearless, enthused and confident, and interested but concerned. Greater Sudbury has a large number of cyclists that travel to safe cycling infrastructure by car (eg trails) for recreational purposes, and a large number of cyclists that cycle on the sidewalk due to the discomfort and fear of cycling on our roads. Conversations with residents at many community events attended by the SCU indicate that many of our residents would cycle more if they felt safe on our streets.
- While we have many recreational trails in the area, our infrastructure does not address the needs of the utilitarian and touring cyclist. Our cycling grid needs to address the needs of our commuters who are forced to use official trails, unofficial trails on private property, parking lots, sidewalks, and other off-road infrastructure in order to get to their destinations. We are also anticipating additional touring cyclists as the provincial grid of touring routes develops, in particular the Lake Huron North Shore and Georgian Bay Cycling Routes, which are currently in implementation phase.
- Active Transportation/Multi Use Paths do not offer the best solution for commuters who want a direct, convenient, and comfortable way to get to their destination of choice. Mixing pedestrians with cyclists is not a good choice when building infrastructure that will be used by commuters; confident cyclists can often travel at speeds upwards of 30 km/hr. Shared paths should be used only in the small number of situations where there is absolutely no other way of accommodating commuter cyclists.

Within these parameters, we would like to offer recommendations and priorities that would assist us to build a network of connected and safe off and on-road options.

Question 1: Below are types of cycling infrastructure that the Ministry of Transportation (MTO) will be making eligible for funding under the program. MTO welcomes your thoughts and feedback on the list below, including what would encourage cycling most, and whether there are additional types of infrastructure the ministry should consider making eligible for funding.

The Ontario Traffic Manual - Book 18 - Cycling Facilities, on page 31, provides a priority index that includes determining criteria for selecting a desirable facility type. The SCU would like to suggest that a priority index for providing funding should also be developed that addresses the most dangerous of road conditions in a municipality and that funding should be directed to addressing those deficiencies.

Priority funding should be provided for projects that address:

- High speed and high traffic roads that have no alternative grid options eg connector arteries between communities where there is only one road connecting the two areas
- High-speed and high traffic roads within the community cores that do not have existing alternatives (eg there are no parallel safe routes that are within a short distance of the road)
- Roads that are dangerous to cyclist manoeuvrability eg roads that contain many lanes, and in particular narrow lanes
- Routes that have many destination points along them eg residential and

business areas, hospitals, schools, recreational facilities (eg parks and playgrounds); in other words, to provide safe and convenient bicycle routes to where people actually want to go

- Cycling infrastructure that provides connectivity to other established cycling infrastructure, thus building a grid of continuous travel routes for cyclists across the whole city.
- Roads where there have been expressed public concerns (eg a number of formal requests received)

Priority funding should be provided to projects that implement separated on or off-road facilities, with physical barriers that separate cyclists from motorized traffic, and from pedestrians. This would be our preferred selection of facilities for high-speed, high-traffic roads, especially those that exceed 60 km/hr. As we well know, the higher the speed, the higher the odds that hitting a pedestrian or a cyclist will result in death. Various studies have provided statistics that show that at a speed of 30 km/hour, the odds of death are 5%. At a speed of 50 km/hour, the odds are 37 to 45%. At a speed of 60 km/hour, the odds of death are 83 to 85%. Also, many studies have identified that people who cycle feel more comfortable on infrastructure that is clearly defined, and separated from vehicular traffic. These projects are also often the most expensive to implement.

Question 2: MTO is considering requiring that projects must be listed in a municipal planning document, such as an official plan, cycling plan and/or active transportation plan, or asset management plan, in order to be eligible for funding. Are there legitimate exceptions to this that the Province should consider?

The Sudbury Cyclists Union agrees with this direction. It is critical that building cycling infrastructure is done in a planned, prioritized, and transparent manner. Cycling infrastructure can no longer be considered to be an "add-on" to our transportation networks. It must be integral to our transportation systems. Complete Streets principles must apply to the design, implementation, repair and maintenance of all roads. The result of good Complete Streets principles will be plans that provide long and short-term deliverables.

The only exception to this would be the requirement to assist in building provincial cycling networks. If a cycling network is identified at the provincial level, and municipal cycling infrastructure on the identified routes does not yet exist, cyclical municipal plan review timelines may not fit into the provincial route's implementation timelines. We would suggest that funding may be provided in order to build infrastructure that is part of provincial plans, but is not yet listed in municipal plans (eg Georgian Bay Cycling Route).

Question 3: MTO will be guided in its evaluation of proposed projects by a number of considerations. Please prioritize the list of evaluation considerations in order of importance to you or your organization. Are there any other considerations that the Province should make in its evaluation of projects?

The SCU recommends the following priorities:

1. improve rider safety and security. Our number one priority should be the safety of all of our residents, and especially our most vulnerable road users. As discussed under Question 1, the priority should be to address deficiencies on high speed and high traffic roads that are the only options for cycling traffic in a community.
2. improve connectivity of (local and recreational) cycling networks and to other transportation modes, particularly transit. Most cyclists are comfortable in making trips that are less than 5 kms in distance. In spread-out cities, multi-modal travel options for trips should be encouraged eg cycle to a transit stop, and use bike racks on the buses to travel to a further destination.

3. increase ridership levels. Build it and they will come. Increasing cycling alleviates congestion, and provides health benefits to individuals and communities.
4. provide equity for all municipalities in Ontario (added priority). Many cities, because of previous historical trends and priorities, do not have cycling infrastructure that would guarantee the safe passage of a cyclist from one area of the city to another. Those cities that face severe challenges in providing a complete, safe network grid may require more help than a city that already has established options for cyclists.
5. enable and demonstrate partnerships. Projects that leverage other governmental and private investments mean the program can deliver a larger number of funded projects.
6. be cost effective. Cost is certainly important to implementing all transportation infrastructure. But it should not be the most important criteria. So many existing roads were designed without Complete Streets principles. Some will be a challenge to correct. But the cost of implementing complete streets should be put ahead of implementing new or expanding existing roads. So much of our money is targeted to developing more road infrastructure which specifically targets motorized traffic, which is unsustainable; transportation demand management principles should be part of all municipal road development.
7. support innovation and collection of cycling-related data/research