

# The Canadian and Halton Cycling Communities

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## COMMENTS SUBMISSION to IAAC: August 2020

**To: CEEA (now the IAAC)**

**Re: Cycling in Halton Region + the Impact Assessment Agency of Canada (the Agency) public comment period as part of the environmental assessment process for the proposed Milton Logistics Hub Project, located in Milton, Ontario.**

To whom it may concern,

In response to the call for public comment on the potential environmental assessment conditions for the project. We do not believe it is relevant that these potential conditions would become legally binding on the proponent if the Minister of Environment and Climate Change ultimately issues a decision statement indicating the project may proceed—because we do not believe that the significant adverse environmental and human health effects can be mitigated in regards to the project moving forward at this location.

Regarding the few mitigations that might be acceptable, there is no means of enforcing or regulating these mitigations once this project is constructed and in operation.

Additionally, Milton Says No has been in touch with the myriad cycling organizations that have used and continue to use Halton Region roads as the major cycling community we are. We would like to submit the following letter to the panel, in general, and in response to the commentary on conditions within the panel's report and the hearing session transcript excerpts from the Public Hearing session which took place June 25, 2019 in Milton regarding the proposed Milton Logistics Hub (CN intermodal terminal):

“CN met with Share the Road Cycling Coalition.  
15 Feedback from this organization indicated that the  
16 cycling facilities were rated bronze for Milton as  
17 defined in their annual yearbook.  
18 Communities at this level are defined  
19 by that organization as communities in the early  
20 stages of becoming more bike friendly.”

“this regard, the expanded Britannia  
22 Road is anticipated to have multi-use paths on both  
23 sides of the road once the expansion is complete. To  
24 mitigate the potential effects — to mitigate the  
25 potential effects on potential cyclists from the

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project, the proposed truck entrance 1 intersection on  
2 Britannia Road includes design features to safely  
3 accommodate pedestrians and cyclists that are moving  
4 along Britannia Road and to and from the residential  
5 communities to the north.  
6 The berms and barriers proposed around  
7 the site would not only serve to mitigate noise, but  
8 will be topped off with local vegetation to provide a  
9 visual screen to recreational users moving past the  
10 project area on neighbouring roads and paths, similar  
11 to what can be seen around the Halton Waste Management  
12 Facility today.”

“In the 2015 traffic surveys completed  
7 by our independent consultants, BA Group, along  
8 Britannia Road a very small number of cyclists were  
9 recorded during these counts. I think it was in the  
10 order of two.”

We provided these immensely understated and, we would argue, misleading and dishonest “study results” to a cycling forum in Milton, including a forum which serves our national cycling team, which is based in Milton. The following quotes are from cyclists in the Halton Region in direct response to CN’s public hearing session comments on June 25 (Registry document: <https://ceaa-acee.gc.ca/050/documents/p80100/130617E.pdf>) regarding the CN-solicited traffic study in Halton/Milton:

*“Trucks in the traffic circles on Tremaine would be lethal! They simply can’t stay in their own lane due to their length, and motorists don’t expect it. I had a close call recently. And YES, I am a cyclist who uses the roads around Milton.” – Julie Rossall*

*“That’s crazy. Milton is cycle central!!” – Heather Kelly*

*“What study - produce that study, and we’ll know who authors reports for Trump.” – Patrick Liddle*

*“I grew up in Milton, but live in Hamilton now. I’m always amazed at the number of cyclists I see riding around Milton when I return to the area” – Richard Bartolo*

*“Best cycling roads in southern Ontario by far.*

*Need to do that study on Sunday morning. 100ts of us on the roads there.” - Pavel Polakovic*

*“Not a big cycling community? I often pass 2 or 3 dozen cyclists on my drive down Britannia to the track. And I ride the roads plenty myself.” – Michael Barkasi*

*“CN = Eyes Wide Shut. 2 is just a ludicrous number. Tons of cyclists.” – Robert Schultz*

*"I always see dozens of cyclists up and down Tremaine - cycling myself. Count me in." – Ian Davis*

*"Roadie here. keep trucks away. They drive too fast and wreck the roads." – Moise Bensimon*

*"Maybe the National team could invite them for a ride. Yes the National CYCLING Team who are based in Milton and all of us could join them." – Karen Jones-Cormier*

*"'Studies' can say whatever you want them to say. You can't see many cyclists when you have your heads up your asses" – Shane Camilleri*

*"They probably did the study in the winter, at night during a snowstorm. Count me in." – Jany Mitges*

*"The oakville cycling club alone has 400+ members and all the routes are around there" – Carlos Vivas*

*"Wasn't it 4 years on July 3rd that a cyclist was struck and killed on Tremaine? If there are so few cyclists on that road, that's a very unlikely event. Regardless, we've already had one too many tragedies here, don't tempt fate by adding more trucks. Add me to your list please." – Derek Hughes*

*"Was it snowing when they did the study?" – Debbie Creacall Burton*

*"Count me in. Not only does Oakville Cycling Club have 450 members and Miton Cycling Club has approx 100 members or the National Track team that train on them but other clubs frequently use these roads during the week and certainly on the weekends" – Phillip Preston*

## A plea from area cyclists to the panel:

*"Thanks for the work you're doing...! Milton has such beautiful riding, I know I and a lot of the national athletes would hate for it to be diminished by so much extra heavy traffic."*

*– Kinley Gibson, Canadian track and road bicycle racer currently living in Edmonton, Alberta.*

Details regarding traffic and pollution arising from the CN intermodal terminal at the proposed location in south Milton are of great concern in particular to cyclists. Halton Region has LONG been a cycling Mecca and as the town has grown, so too has the culture of sharing the road with cyclists. To this day, Halton continues to serve cyclists from across the GTA who ride Halton roads and trails daily. Our concerns were amplified upon learning that CN is purporting to have

studies that claim this region is not a major cycling community. This is simply false, inaccurate and very troubling that they would make these types of misrepresentations.

Cycling in Halton is a lifestyle, a cultural pursuit that has been cultivated and encouraged by the region and by the very existence of our greenspace and our historical outdoors community where cycling is best enjoyed.

The proposed location is not anywhere near highways. Thus requiring the addition of 1,600 transport trucks per day to Halton roads in order for these trucks to travel, at will, throughout the region, our roundabouts and our community roads to gain access to major highways. This would be not only detrimental to our cycling community and culture in Halton, but it would be catastrophic. We believe it could alter our future as a cycling community altogether. Trucks and heavy industry are simply not compatible in any way with cycling. Between the danger the increased truck traffic poses on these roads, coupled with the exponential increase in diesel pollution and congestion...this would be a significant adverse environmental effect that is unacceptable.

Please, CN, reconsider the proposed location and place this facility—which we agree is important—in a location where it is zoned appropriately, where the municipality, region and province agree it is appropriate, and where it will not place cyclists in harm's way. We were here first; this is our cycling community; this is our outdoor region.

To dignitaries and elected officials, the Canadian Transportation Agency, and other governing bodies, please advocate for our cyclists and our region and stop this proposal once and for all at this inappropriate location.

***Finally, sobering statistics from the City of Montreal, 2017:***

“At least a fifth of all cycling deaths in Montreal since 2005 are caused by collisions with heavy trucks and tractor-trailers, data obtained from Quebec's coroner shows.

“CBC News obtained coroner's reports for 59 cyclist deaths in Montreal from 2005 to 2016, though complete sets of reports were not yet available from 2015 onwards.

“The reports showed that 12 cyclists were killed in collisions with trucks during that time, 10 of whom were drawn under the wheels of the trucks and crushed. In five of those deaths, the truck driver was turning and may not have seen the cyclist.

“Two cyclists were struck by the front of the truck.

“There have been at least two additional cyclist deaths due to collisions with trucks in Montreal in 2017, but coroner's reports are not yet available.

“The death of 41-year-old Meryem Ânoun in July, one of the year's two collision deaths involving trucks, renewed calls from cycling groups to do more to regulate trucks on city streets, after she was struck by a truck turning right at the intersection of Bélanger and 6th Avenue.”

We respectfully ask the panel to hear our concerns.

Sincerely,

Milton Says No per the following ORGANIZATIONS:



**Cyclisme Canada Cycling**

*17,925 followers*



**Milton Bicycle Club**

*109 members*



**Oakville Cycling Club**

*400 + members (617 followers)*

**'Mattamy National Cycling Centre - Milton Velodrome forum**

*1,391 members*

**Bikeit Halton Hills**

*499 followers*

## INDIVIDUAL RIDERS:

*Derek Hughes*

*Debbie Creacall Burton*

*Phillip Preston*

*Julie Rossall*

*Heather Kelly*

*Patrick Liddle*

*Richard Bartolo*

*Pavel Polakovic*

*Michael Barkasi  
Robert Schultz  
Ian Davis*

**INDIVIDUAL RIDERS (cont'd):**

*Moise Bensimon  
Karen Jones-Cormier  
Shane Camilleri  
Jany Mitges  
Carlos Vivas  
Kevin Vagg  
Galen Naidoo-Harris  
Laurence Hanly  
Shannon Dowd  
Igor Sram  
Stephen Ellis  
Rich Poulin  
Barbara Kaczor McVeigh  
Matt Baker  
Robin Marjoribanks  
Patrick Wulfers  
Bessie Pletsas  
Michael Vallejera Ybanez  
Jay F Goodwin  
Martin Honsberger  
Ronnie Gee  
Hamish Gordon  
Gord Townley  
Janice Townley  
Martin Gledhill  
Jorge Fulcar Madera  
John Sombrits  
Adriana Hernandez-Huerta  
Rob Elsey  
Tyson Herwynen  
Stacey Newman  
Stephen Newman  
Chris Manzur  
Jaime Manzur  
Andrew Orr  
Rob Elsey  
Heidi Kroes  
Don Kroes  
Brandon Johnston  
Brigitte May  
John Sombrits  
Ruth Gagnon*

*Maciej Berczynski  
Heather Kelly  
Patrick Liddle  
Ian Davis  
Jim Gantley  
Sven  
Darrell Gabourie  
Judy Daniel  
Marek Browarek  
Marek Krzton  
Debbie Creacall Burton  
Dave Krentz  
Craig Vanderbolt  
Jeff Brown  
James Layfield  
Janine Theben  
Kamran Aslam  
Steph Cholyk  
Ayesha D'Lima  
Leanne Gilbert  
Bessie Pletsas*