

The Honourable James J. Bradley
Minister of the Environment
Atten: Mrs. Agatha Garcia-Wright
Environmental Assessment and Approvals Branch
2 St. Clair Avenue West, Floor 12 A
Toronto ON M4V 1L5

May 14th 2014

Re: Notice of Completion – Municipal Class Environmental Assessment – Second Avenue (MR72) Infrastructure Improvements. Notice issued April 16th 2014.

Requester Details: The following comments are presented by the Minnow Lake Restoration Group (MLRG), an Ontario incorporated not-for profit organization registered as an environmental charitable entity (87663 3074 RR 0001) with the Federal Government.

Proponent Details: Reference is made to Notice of Completion issued April 16th 2014 regarding Municipal Class Environmental Assessment Second Avenue (MR72) Infrastructure Improvements by the City of Greater Sudbury.

Request: Specifically for a Part Two Order as detailed in Ontario procedural process document <http://www.ontario.ca/environment-and-energy/class-environmental-assessments-part-ii-order#section-0>.

Reason for Request: There are a number of concerns related to the environmental impact the proposed road reconstruction will have on the immediate neighborhood and wider community including the Ramsey Lake Watershed and Ramsey Lake, which is the source of drinking water for over 50,000 residents of The City of Greater Sudbury. A Source Water Protection Plan has been completed for Ramsey Lake but has not been implemented at this time. Specific concerns with the proposed road construction include the impact of increased storm water run-off and also the negative environmental health effects to residents, pedestrians, cyclists and related safety issues.

With the publication of the Notice of Completion by the City of Greater Sudbury, there was no Environmental Study Report available for review for members of the MLRG or the general public. Attempts were made to view the report through the usual venues, such as the numerous public libraries within the city and the planning department of the city. The contact individual listed in the Notice was not available, however numerous calls eventually connected with the Manager of Roads, who indicated that no Environmental Study Report was available for this project. **It is our understanding that this is in contravention of the Environmental Assessment Act process.**

Project Details: The present two lane secondary artery is to be expanded to five lanes (four traffic, one turning) over about 700 metres and then three lanes (two traffic, one turning) for a further 300 metres or about a kilometer in total. Including bus bays, a new intersection at Scarlet Drive will feature a seven lane pedestrian crossing and be as large as or larger than most intersections on major road corridors in the city.

Impact of Project: The increased surface area of the new roadway will more than triple the amount of surface (storm) water entering into the storm water drainage system in the Ramsey Lake Watershed. Presently, open ditches service much of this area and provide for a level of natural filtration and infiltration of runoff. In the proposed extension of the original project, more ditches would be replaced by underground pipes thus reducing natural filtration. All storm water would flow into Frobisher Creek and subsequently to Ramsey Lake. Frobisher Creek has been identified as the principal source of nutrient discharges to Ramsey Lake under current conditions. Of particular concern are the phosphorus inflows which in Frobisher Creek in the last year tested (2010) reached 110.5 ug TP/L compared to the Ontario Provincial Water Quality Objectives level for aquatic life at 30ug/L. (Attachment 1)

Storm Water Concern Details: The city (proponent) has said there are no plans to incorporate any storm water treatment devices, such as Stormceptors or similar technologies, to address the increased loadings of pollutants discharging to Ramsey Lake. In addition to the storm water residues associated with nutrients, metals and suspended solids, the increased road surface areas proposed would necessitate the need for increased salt applications for winter de-icing operations. This additional loading will contribute to the already elevated salt level of over 50 mg/L for Ramsey Lake, which is a drinking water issue according to the Source Water Protection Plan. With levels in excess of 20 mg/L, the local medical officer of health must be notified so this information can be made available to local physicians and patients.

Atmospheric Emission Concerns: The new intersection with stop and go traffic will further release environmentally harmful pollutants into the atmosphere by up to 30 percent and also the close proximity of the roadway to the social housing units will further affect the atmosphere in this highly residential area that already has a high incidence of respiratory illness.

Environmental Safety Concerns – Safe Alternative: Safety is an environmental concern of some significance. Fewer lanes of traffic and a single lane roundabout would reduce potential fatalities according to recognized statistics. Spills and the release of pollutants, such as fuel, as a result of vehicle accidents would report immediately to Frobisher Creek and Ramsey Lake under the proposed implementation of storm drains and underground piping.

The city (proponent) has advised there is not sufficient space for a roundabout, except by using a portion of civic cemetery property, however, by comparing city plans for a proposed roundabout in the same area to the planned five lane reconstruction and large regular signaled intersection it does seem possible that a roundabout would be a suitable alternative considering the available municipal property. Fewer traffic lanes, and a roundabout with no traffic signals could reduce development and on-going maintenance costs considerably to allow more resources to be directed to storm water control measures.

Efforts to Resolve Concerns: Meetings, discussions with and submissions to relevant city staff have taken place with respect to this matter since March 19th of this year, by ourselves and other interested and affiliated parties. There was no public consultation prior to this date and any environmental studies undertaken by the city were not made available. Despite requests for consideration of options, the only concession granted by the city was the provision of bicycle “tracks” on the paved snow collection area between the roadway and sidewalk on the five lane portion of the roadway and bike lane markings elsewhere.

In meetings with the proponent (city) the suggestion for a three lane roadway (two traffic one turning) and a more regular sized signaled intersection and also a roundabout in place of a signaled intersection were both rejected, as not addressing present and future traffic flows. The city did admit that they endorse roundabouts but said this road reconstruction is similar to other projects undertaken recently in the city, primarily in the outlying areas and they felt it was suitable in this instance.

It is not our intent in requesting a Part Two Order to stop this project, but to review the environmental considerations outlined in order to achieve the objectives of the project while reducing the negative environmental impact and to study viable alternatives which may have not been originally considered.

Rational: Specifically we recognize the need for improved road infrastructure for Second Avenue, but feel the objectives can be achieved in a more environmentally friendly, less intrusive, safer and more cost effective manner with savings directed to other environmental concerns in this area resulting from the project.

Consideration of Alternatives: It is proposed that Second Avenue be rebuilt to a three lane configuration with the provision of a modern one lane roundabout at Scarlet Drive and the new Cemetery/Dog Park entrance. According to recognized capacity standards this roundabout could function satisfactorily with up to 26,000 vehicles daily, far in excess of the current city figure of 15,000 vehicles and any reasonable projected volumes. City staff recognizes the value of roundabouts and has plans for this type of intersection elsewhere in the city. It is believed there is sufficient space for this type of intersection properly engineered at this location allowing for the accommodation of retail establishments in small adjacent strip mall. (Attachment 2)

Why this request: To take into serious consideration the environmental concerns presented which we respectfully feel were not adequately addressed previously or viable alternatives considered with respect to protection of the watershed, lake drinking water quality, plus residential environmental and safety factors. It is suggested that savings resulting from the reduction of the number of lanes and the creation of the roundabout be directed to storm water management as part of the project, and in particular the implementation of Stormcepters or other recognized effective measures such as employed elsewhere in the city (Lake Nephawin) to help alleviate the discharge of storm waters in Lake Ramsey. Implementation of Best Management Practices with respect to Storm Water Practices should also be incorporated into the construction and operational phases of the proposed project.

We welcome the opportunity to participate in the Class Environmental Assessment Part Two Order.

John Lindsay
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Copy: City Clerk, City of Greater Sudbury, PO Box 5000, Station A Sudbury ON P3A 5P3

Attachments (2)