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The Highway Traffic Board 200-301 Weston Street Winnipeg, Manitoba R3E 3H4

## Re: Proposed speed limit increases on four-lane divided roadways

I am writing on behalf of Green Action Centre regarding the proposed increase in the posted speed limit from 50 to 60 km/h on four-lane divided roadways in Winnipeg. Increases in speed limits would be inappropriate unless the interests of all road users are protected, as outlined in a "Complete Streets" approach. This approach involves designing and operating our roads to provide safe and convenient access for all users – whether they are walking, riding the bus, driving, cycling or delivering goods. It recognizes the need to plan for the most vulnerable road users – children/youth, seniors, persons with disabilities – which results in a design that accommodates all users.

A "one size fits all" approach to setting speed limits does not take into consideration adjacent land uses and perpetuates a preference for those travelling by motorized vehicle over other road users, in particular pedestrians and cyclists. For example, looking at one of the roadways under consideration, increasing the speed limit for motorized vehicles on Grant Avenue would reduce the safety of pedestrians from surrounding houses and apartment buildings crossing Grant to reach the shopping centre and students walking or cycling to Grant Park High School.

OurWinnipeg, the City's new long-term vision, recognizes this critical connection between land use and transportation. Perhaps it was an early acknowledgment of this connection that compelled councillors and The Highway Traffic Board to reduce the speed limit to 50 km/h on Grant years ago.

If there are issues with speeding on sections of four-lane divided roadways in Winnipeg, it does not automatically follow that the posted speed limit should be increased. As you are no doubt aware, road design plays a key role in influencing the actual operating speed at which motorists travel. A roadway that is wide, straight, open and flat encourages the motorist to drive faster. If motorists are driving above the *desired* speed limit because the road design encourages it, the answer should be to address road design. In many such cases, engineers would argue for increased posted speed limits (or turn down community requests to reduce speed limits) based on the "85th percentile" defence. However, the idea that the speed at (or below) which 85% of motorists are travelling on a road is therefore reasonable and acceptable is a circular argument that feeds on itself.

Furthermore, the impact of a 10 km/h increase on fatality rates for pedestrians is significant due to the additional distance required to stop. Studies have shown that a 1 km/h increase in travelling speed results in a 3% higher risk of a crash involving an injury and a 4-5 % increase for crashes that result in fatalities. (www.sciencedirect.com/science/article/pii/S0001457597000365)

If improving motorized traffic flow is the goal, the focus should be on "rolling speed harmonization" instead of increasing posted speed limits. However, once again, this focuses on motorized traffic and ignores the needs and safety of other road users. It fails to recognize that traffic consists of all road users – pedestrians, cyclists, transit riders, motorists, delivery drivers.

For these reasons, Green Action Centre proposes a moratorium on consideration of speed limit increases pending development of guidelines that incorporate the interests of all road users. Criteria for the design and operation of roadways and the management of traffic should be based on the OurWinnipeg and Complete Streets approaches.

We also strongly encourage The Highway Traffic Board to schedule additional public hearings at a time when more members of the public could attend. Scheduling the hearings during the workday certainly limits the input that will be received by the Board and the opportunity for all to participate.

Sincerely,

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