



**City of Guelph  
Proposed Official Plan Amendment  
for the  
Proposed Emma-Earl Street Pedestrian Bridge**

**Comments to:  
Guelph City Council  
Planning Meeting  
February 8, 2021**

**Submitted by:  
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Residents for a Safe Speedvale Avenue**

## Recommendations

- That City Council does not approve the Amendment to the Official plan until the Emma- Earl Bridge (EEB) Environmental Assessment (EA) is approved by the Ministry of the Environment, Conservation and Parks (MECP)
- That the City undertakes a detailed analysis specifically outlining the “need” for the EEB
- That the City clearly identify who benefits from the Emma to Earl Street Bridge, why they would benefit and how they would benefit
- That the city expand the scope of the EA and consider all alternatives to the undertaking in the EEB, including a Speedvale “safe zone” between Marlborough Road and the west side of the Speedvale Bridge.
- That the City organizes meaningful consultation with the public and Aboriginal communities that promotes meaningful discussion and resolutions with regard to the EEB EA.
- That the City fairly evaluates the Alternatives (including alternatives “to” the undertaking) that identify and consider public concern and comments.

## 1. Introduction

This report outlines the reasons why the City of Guelph Council cannot support the Official Plan Amendment (OPA) for the Emma- Earl Bridge (EEB).

The requirements for the OPA have not been met.

The following is required in order for Council to consider an amendment to the Official Plan for the Emma/ Earl Street Pedestrian Bridge.

1. **COMPLETED** EEB Class Environmental Assessment (EA) EEB.
2. The bridge must be determined to be “**ESSENTIAL**” transportation infrastructure.

## 2. Environmental Assessment Requirements

### **2.1 Natural Heritage System Requirements**

The Natural Heritage Systems (NHS) in the Official Plan (OP) requires that an EA be **completed** and the potential impacts assessed in accordance with the requirements of the Class EA.

**The required EA is not complete.** The Ministry of Environment, Conservation and Parks (MECP) **has determined that the project was not planned in accordance with EA requirements.**

Further study is needed to

1. determine project impacts
2. Aboriginal consultation is required
3. documentation on how public concerns were considered in the identification of the preferred alternative is required.

#### **2.1.1 Project Impacts in Contradiction of the NHS Policies and OPA Opportunities**

The EA requirements set forth by the NHS in the OP have not been completed and potential impacts not yet assessed in accordance with the requirements of the Class EA.

Therefore, the City **CANNOT consider an Official Plan Amendment** until the required EA is approved by the MECP **AND the EEB can be shown to have no negative impacts** on NHS features.

Furthermore, the incomplete EA has identified some areas of negative impact. The NHS policies requires the City to **ensure there are NO negative impacts** to natural heritage features.

Negative impact has been identified as follows:

**a) Natural Heritage Features**

“Permitted development and site alteration within and/or adjacent to natural heritage features... shall be required to demonstrate, through an Environmental Impact Study (EIS) or EA ... that **no negative impacts** on the **natural heritage features** and area to be protected or their **ecological hydraulic functions**. “Natural Heritage System 6A.1.2, General Permitted Uses – 6, Amendment No.42 to the Official Plan.

The following negative impacts are identified. **The mitigation measures outlined in the EEB EA are unable to ensure NO NEGATIVE IMPACT.**

**Identified Impacts :**

- i) Table 4-5, EA Evaluation of the Five Alternatives for *Hydraulics and Flooding Evaluation Criteria* is scored at “3” indicating **there is a negative impact.**
- ii) Table 4-5, EA Evaluation of the Five Alternatives for Emma to Earl Street Bridge, *Aquatic and Terrestrial Evaluation Criteria* indicates that there is minimal, impact to aquatic habitat and tree removal is required impacting the Terrestrial habitat. Indicating **there is a negative impact.**
- iii) **Species at risk -Butternut Tree** was identified during the TransCanada Trail construction, located along the TransCanada trail between Earl and Mac. This is within 120 of the proposed project. This is not included in the Environmental Impact Study
- iv) **Species at Risk – SAR Bats** potential impact identified, MECP requires study
- v) **Species of Special Concern – Snapping Turtle** The Snapping Turtle habitat is **mapped incorrectly** in the EA. Snapping Turtles have also been seen nesting along the Armtec fence line and along the Emma Street roadside between the river and the railway. *These nesting areas conform to the characteristics of nesting habits of Snapping turtles generally inhabit shallow waters where they can hide under the soft mud and leaf litter. Nesting sites usually occur on gravely or sandy areas along streams. Snapping turtles often take advantage of anthropogenic structures including roads (esp. gravel shoulders), dams, and aggregate pits. (MNR 2016)*

The bridge and sidewalk would **permanently destroy** these Snapping Turtle Nesting habitats.

### 2.1.2 Aboriginal Consultation

Aboriginal Consultation has not been completed. Required documentation requested by the MECP

### 2.1.3 Public Consultation Requirements

- a) The MECP has determined that the project documentation does not indicate how public concerns or comments were considered in the identification of the preferred alternative.
- b) **Identification of the Preferred Alternative** Table 4.5, EA Evaluation of the Five Alternatives summarizes the evaluation of alternatives and results in the identification of the preferred alternative. The resulting cumulative score, where the higher score indicates the preferred alternative, is as follows:

**Ranking Score: 35** for the NULL Alternative,

**Ranking Score: 37** for Alternative 2b – Steel Box Truss – Double Span – Hydro within the Structure.

These scores are so close that further investigation into the evaluation criteria and explanations is warranted.

Furthermore, at the Public Information Centre #2, half the participants disapproved of the preferred alternative presented at the meeting and preferred the Null Alternative.

It can easily be argued that **the NULL Alternative is the preferred Alternative.**

For example, the Public Safety Concerns for the Null Alternative are ranked at “0” which indicates there is no negative impact. In contradiction to this, a letter from Armtec (adjacent industry to the proposed bridge), clearly outlines safety concerns with pedestrians and transport: trucks travelling along Earl Street or between the two Armtec Properties on either side of Earl Street. There are also public safety/security/vandalism concerns that were identified clearly in the Public Information Centres 1 and 2, and in subsequent correspondence and delegations to the City. No mitigation is outlined in the EEB EA .

The ranking must reflect these concerns.

Another glaring example is Landowner impacts which is described as Impact on City of Guelph road right of way and **adjacent** landowners. “Adjacent” was described at the September 28 Council meeting by Guelph Project Engineer Ken VanderWal to include *“not only looking at the immediate landowners, we would be looking at impacts on Speedvale that*

*are already discussed for land acquisition as well as other users of the trail system so it is a little of both, impact to land owners property-wise and the impact to citizens and landowners when using it (the EEB) and potentially other locations of the City as well.”<sup>1</sup>*

This definition of “Adjacent “ to include the entire City makes the definition of “Adjacent” meaningless.

The definition used by staff more accurately describes the “Benefits to the Community” criterion.

**Adjacent landowners which usually refers to landowners in the direct vicinity of the proposed project.** To use any other definition would be misleading, a manipulation of the evaluation criteria and lead to an incorrect evaluation of alternatives.

Again, if comments and concerns raised by Armtec, the Homewood and property owners are taken into consideration the safety ranking for the Null Alternative would not be “1” – it would rank higher

If just these two inconsistencies are addressed and ranked in accordance to the concerns expressed by the public, the Null Alternative would score as the Preferred Alternative.

Further details and explanations for the Null alternative being the preferred Alternative can be found in **Appendix B in this report: Table 4.5, EA Evaluation of Alternatives - revised to Include Public Comments and Concerns**

**c) Public Concern and Comment and the Evaluation of Alternatives**

Public comment and concerns were not systematically evaluated in clear, concise manner in the evaluation of alternatives in the EEB EA.

Upon review of Table 4.5, EA Evaluation of the EEB’s Five Alternatives, public concerns have not been considered, explanations for the ranking are inconsistent, illogical and are biased in favour of EEB construction .

Details of the inconsistencies have been outlined and re-evaluated in **Appendix B of this report Table 4.5, Evaluation of Alternatives -Revised to Include Public Comments and Concerns** which include explanations of the changes.

**d) Public Consultation process**

The EEB EA’s Public Consultation has resulted in a divisive process where concerns have not been identified, addressed, nor considered.

- i) The Public Information Centres did not encourage constructive dialogue or create a means to express concerns.

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<sup>1</sup> See live video 1:40:09 (<https://pub-guelph.escribemeetings.com/Players/ISISStandAlonePlayer.aspx?Id=2020fa26-77d9-466c-8a1f-debcf54187b6>)

- ii) Public participants that are in support of a fair evaluation of the Null Alternative have been told by City Councillors
  - ***“I understand that you are trying to poke holes in the process and stop the bridge from being built.”***,
  - ***“if you support the Bridge then we will consider your mitigation requests”***
- iii) ***“(I) am not seeing a value in an ongoing argument about this.”***  
Other participants are now refusing to participate as the process of participation has left them feeling “humiliated” .
- iv) Most participants that are in favour of the null alternative are frustrated with the public consultation process because they have found their comments are not being considered.

**All these examples show a disregard to the public consultation process and purpose.**

<https://www.ontario.ca/page/consultation-ontarios-environmental-assessment-process#section-2> outlines appropriate consultation and can be used as a resource tool to develop and implement a consultation plan.

“The Class Environmental assessment process requires the proponent to Consult with Potentially Affected and Other Interested Persons (3.1.1) in order to **“Make the planning process a cooperative venture with potentially affected and other interested persons. Early consultation with interested persons is essential.**

Consultation with interested persons is a cornerstone of the class environmental assessment process and is a legal requirement of the *Environmental Assessment Act*. The applicant and proponent should seek to involve all interested persons as early as possible in the planning process so that their concerns can be identified and considered before irreversible decisions and commitments are made on the chosen approach or specific proposals. Applicants and proponents should present sufficient and varied opportunities for consultation and interested persons should take advantage of the opportunities and become involved in the planning process. The results of the consultation must be documented at the end of the planning process. **Consultation, when done well, can improve the outcome of the planning process.** To achieve this, the planning process must be constructed, in part, around the involvement and contribution of potentially affected and other interested persons. The benefits of doing this include:

- **Improving the understanding of environmental concerns before irreversible decisions** are made and focusing the proponent’s planning on matters of concern;
- **Encouraging the identification and consideration of issues before the class environmental assessment or project documentation is**

made available for review to reduce the time required during the formal decision-making process to resolve outstanding issues;

- Promoting mutually acceptable, environmentally sound solutions.”<sup>2</sup>

#### 2.1.4. Strategic Plan Alignment

The proposed EEB **does not align** with the following strategic plan priorities:

a) ***Sustaining our Future:*** *Protecting the green infrastructure provided by woodlands, wetlands, watercourses and other elements of Guelph’s Natural Heritage System.* The proposed bridge necessarily negatively impacts and potentially destroys significant Natural Heritage features. The City argues that the Emma to Earl Bridge gives an opportunity to clean the river and restore habitat. It is already the City’s responsibility to clean and restore the Natural Heritage features of our City. , **The City does NOT need to build a bridge in order to fulfil its’ obligations and responsibilities to protect the green infrastructure provided by Guelph’s NHS.**

b) ***Navigating Our Future:*** *Improving connections to workplaces in Guelph, investing in and promoting active transportation.* There is no transportation data or cost-benefit analysis demonstrating that the EEB substantially improves connections or promotes active transportation.

***Building Our Future:*** *Continuing working to develop new assets that respond to Guelph’s growing and changing social, economic and environmental needs.* The EEB does not align with routes outlined in the Cycling Master Plan nor the Active Transportation Network, nor does it link existing and proposed trails in a meaningful, connected and direct manner. Therefore, the EEB is a cost rather than a benefit to the community

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<sup>2</sup> Refer to <https://www.ontario.ca/document/preparing-reviewing-and-using-class-environmental-assessments-ontario/part-preparing-terms-reference-and-class-environmental-assessment> section 3.1.1



### 3 .“Essential” Transportation Infrastructure within Natural Heritage features and their established buffers

In the glossary of terms of the Official Plan, March 21, 2018 Consolidation, pg. 353 “Essential means that (1) there is a demonstrated need, and (2) it has been demonstrated that no other reasonable alternative exists.

#### **3.1 City staff unable to identify the need**

The city has not studied nor provided any study or documentation that clearly identifies the extent to which the bridge will be used, nor by whom. The proponent has only referenced other documents to justify need which are considered below. Furthermore, the EEB EA does not provide any information on who would use the Bridge nor any understanding of who would use Bridge.

When Councillor Goller asked, asked “What extent will the bridge be used?” Terry Gayman, General Manager/City Engineer, Engineering and Transportation Services, responded: *“While we do not have specific numbers for that type of projection, we do anticipate just by need that has been identified over the past 15 years that the connection from a pedestrian/cyclist perspective is warranted and certainly we are seeing this through Covid, is an uptake in additional transportation so we will be keeping an eye on this as well.”*<sup>3</sup>

##### **3.1.1 No justification for the Bridge is identified in documents cited to “justify” EEB need .**

The City’s EEB EA has cited several documents to justify the need for the EEB, including the Cycling Master Plan, Active Transportation Network Study, and the Trail Master Plan.

Justification for the bridge at the River Systems Advisory Committee (RSAC) meeting in May 2017 which details a different need for the bridge is described in Section IV below. The EA the Opportunity Statement is defined as follows:

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<sup>3</sup> City of Guelph Council Meeting, September 8, 2020 - video 1:45:50 (<https://pub-guelph.escribemeetings.com/Players/ISIStandAlonePlayer.aspx?Id=2020fa26-77d9-466c-8a1f-debcf54187b6>)

*To conform with the City’s Biking Policy and Cycling Master Plan principles and objectives, the City Council approved, on July 22<sup>nd</sup>, 2015, an Environmental Assessment for a pedestrian bridge connecting Emma Street to Earl Street, over the Speed River.*

*“The Emma Street to Earl Street bridge shall ultimately be designed as a pedestrian and cycling bridge, that provides a car free route for cyclists and pedestrians traveling between downtown and the north-east corner of the City of Guelph, with the least impact on the natural environment within Speedvale River Valley.”<sup>4</sup>*

**a) Systematic analysis of existing and proposed routes.**

The City has not undertaken a systematic analysis of existing and proposed routes that don’t require an EEB to move pedestrians in a safe, direct manner to and from downtown to the northeast corner of Guelph. It can be shown that by using the existing Heffernan and Norwich Bridges, the cycling and pedestrian routes proposed in the Cycling Network Map, and the Active Transportation Map, routes to all Major Destinations outlined in the Trail Master Plan CAN be clearly identified that avoid major streets, that maximize off -road routes, and are safe.

**b) Cycling Master Plan (CMP)**

The CMP outlines the vision and principles for cycling planning in Guelph but the EEB is not identified in the CMP nor is the EEB identified as a necessary link in the accompanying Proposed Cycling Network Map.<sup>5</sup>

The proponent has assumed need to conform to the principles set out in the CMP but this should not supersede the need to conform to the NHS outlined in the OP. Furthermore, protection of the natural environment was identified during EA Public Information Centre #1 as the most important criteria, not conformity to the CMP.

**c) Active Transportation Network (ATN)**

The recommended ATN does not identify the need for the proposed EEB.

The Progress Report on Guelph’s Cycling and Walking Programs, August 2019 and the accompanying Map EX – 1 Recommended Active Transportation Network does not identify the EEB in the recommended Network Map.<sup>6</sup>

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<sup>4</sup> <https://guelph.ca/wp-content/uploads/1-Emma-Street-to-Earl-Street-Bridge-EA-Project-File.pdf> see 2.2 Opportunity Definition

<sup>5</sup> [https://guelph.ca/wp-content/uploads/CyclingMasterPlan\\_ProposedNetwork\\_Feb2013.pdf](https://guelph.ca/wp-content/uploads/CyclingMasterPlan_ProposedNetwork_Feb2013.pdf)

<sup>6</sup> <https://guelph.ca/wp-content/uploads/August-9-2019-Active-Transportation-Update-Report.pdf>  
<https://guelph.ca/wp-content/uploads/Map-of-Proposed-Active-Transportation-Network-July-2017-3.pdf>

**d) Trail Master Plan (TMP)**

During Public Information Centre #1, the “need” for the EEB was identified with reference to the **TMP**.

The TMP identifies the Emma Earl Bridge but does not identify nor provide any justification for the EEB specifically. In the Section describing the need for Bridges and Structures, the EEB is not mentioned: *“There are a number of locations throughout the network where structures will be required in order to maintain continuity of the network. In most cases these are small bridges over tributaries and drainage features. In a few locations more significant structures will be required to cross rivers. Included with this group are crossings of the Eramosa River at Victoria Road, where it is recommended that a trail bridge be constructed as part of the reconstruction of the **Victoria Road** vehicle bridge. In the area of the Speed River and the **Hanlon Expressway**, the reconstruction of the former Guelph **Dolime** bridge provides an opportunity to cross these significant barriers. Alternatively, a new bridge over the river at the foot of **Municipal Street** would be required. In addition to bridges, this group also includes the crossing of the **CN rail line** in two locations, at **Cityview Drive** or an underpass at **Hadati Creek**, and the second location is on the south side of **Margaret Greene Park** to make the connection with the Primary route along the northwest drain. Crossings/underpasses will require extensive negotiations with **CN** and are costly to construct. They are included in the plan as long term, but important connections. A primary trail is proposed for the **Silvercreek Parkway** corridor between **Waterloo Avenue** and **Paisley Road**. The GTMP assumes that the road crossing of the railway will be at-grade, using appropriate design standards that would be implemented when nearby lands are redeveloped. Therefore it is assumed that cyclists and pedestrians will cross at grade also.<sup>7</sup>*

- i) The lack of need for the EEB is not specifically identified in the TMP, staff referenced the Evaluation Criteria, Guelph Trail Master Plan, Final Report – Fall 2005, pg 27  
Upon review of the Evaluation Criteria, the EEB :
- Is not an integral part of the citywide network;
  - There are other nearby routes that perform the same function;

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<sup>7</sup> Trail Master Plan, p. 40.

- Does not provide access to major recreational and utilitarian destinations;
  - has negative environmental and garbage impacts on terrestrial and aquatic communities during and after construction.
- ii) The TMP states *"In some cases trails (and people) should not be in natural areas. Vegetation communities that are highly sensitive to disturbance and narrow, constrained wildlife corridors are two examples where trails may not be appropriate. In these cases, it is advisable to provide alternative trail routes and information (e.g. signing, public information campaigns etc.,) explaining the management decision to exclude trails from the area."* <https://guelph.ca/wp-content/uploads/GuelphTrailMasterPlan.pdf> see pg 30
- iii) The 2005 TMP is currently under review and up to date information is not yet available.

**e) River Systems Advisory Committee (RSAC)**

- i) In a staff presentation to the River Advisory Committee the EEB context or "need" was described as a means to connect cyclists between Bullfrog Mall and Downtown .
- ii) **Appendix B** provides a detailed analysis of possible routes between Downtown and Bullfrog Mall and shows how using this example as a justification for the EEB contradicts the principles of the TMP.
- iii) The "context" presented to RSAC was misleading in that it did not describe the EEB EA undertaking accurately.
- iv) The City **NEVER** presented the Null Alternative to RSAC nor Heritage Guelph. Refer to EEB Final Report, Public Consultation Appendix.

## 3.2 Consider a Reasonable range of Alternatives

### 3.2.1 A reasonable range of alternatives must be considered.

*During the EA process, applicants and proponents should consider a reasonable range of alternatives. This should include examining "alternatives to" which are functionally different ways of approaching and dealing with the defined problem or opportunity, and "alternative methods" of carrying out the proposed project which are different ways of doing the same activity. Depending on the problem or opportunity identified, there may be a limited number of appropriate alternatives to consider. If that is the case then there should be clear rationale for limiting the examination of alternatives. The "do nothing" alternative must also be considered.<sup>8</sup>*

### 3.2.2 Alternatives to the undertaking not considered in the EEB EA

During the EA process, alternatives "to" the undertaking were identified but never considered – some due to the EA's limited scope. These include:

1. **Null Alternative**
2. **Alternative routes**
3. **Speedvale Bridge Underpass or "interim solution"**
4. **Speedvale "Safe Zone"**
5. **Re-consideration of Bike Lanes on Speedvale**

1. **Alternative routes**

The EEB EA did not consider nor analyse existing and proposed routes not requiring the EEB but can still move pedestrians in a safe, direct manner to/from downtown and to/from the northeast corner of Guelph. It can be shown that by using the existing Heffernan and Norwich Bridges, the cycling and pedestrian routes proposed in the CMP and the Active Transportation Map, routes to all Major Destinations outlined in the Trail Master Plan CAN be clearly identified that avoid major streets, that maximize off-road routes, and are safe.

2. **Speedvale Bridge Underpass and "Interim Solution"**

The proposed Speedvale underpass nor "interim solution" was not considered during the EEB EA.<sup>9</sup>

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<sup>8</sup> See Part A Preparing the Terms of Reference and Class Environmental Assessment 3.1.2

<sup>9</sup> [https://guelph.ca/wp-content/uploads/council\\_agenda\\_121718.pdf#page=51](https://guelph.ca/wp-content/uploads/council_agenda_121718.pdf#page=51)

### 3. Speedvale “Safe Zone” (SSZ)

The “Speedvale Safe Zone” was not considered during the during the EEB EA.

- a) The SSZ was suggested by RSSA transportation planner Martin Collier Avenue in June 2017 as an alternative “to” the undertaking.

#### b) Background

A 1 kilometer section of Speedvale Avenue is being reconstructed and widened for \$20 million between 2021 and 2024. When the road is widened, it will induce more traffic at higher speeds. Yet pedestrians and cyclists (as a legal vehicle recognized under the Highway Traffic Act) will continue to use the length of the road, especially in the area where the Trans-Canada Trail intersects. To ensure vulnerable users are still welcome in this area, the Residents for a Safe Speedvale Avenue propose that a “Safe Zone” be installed.

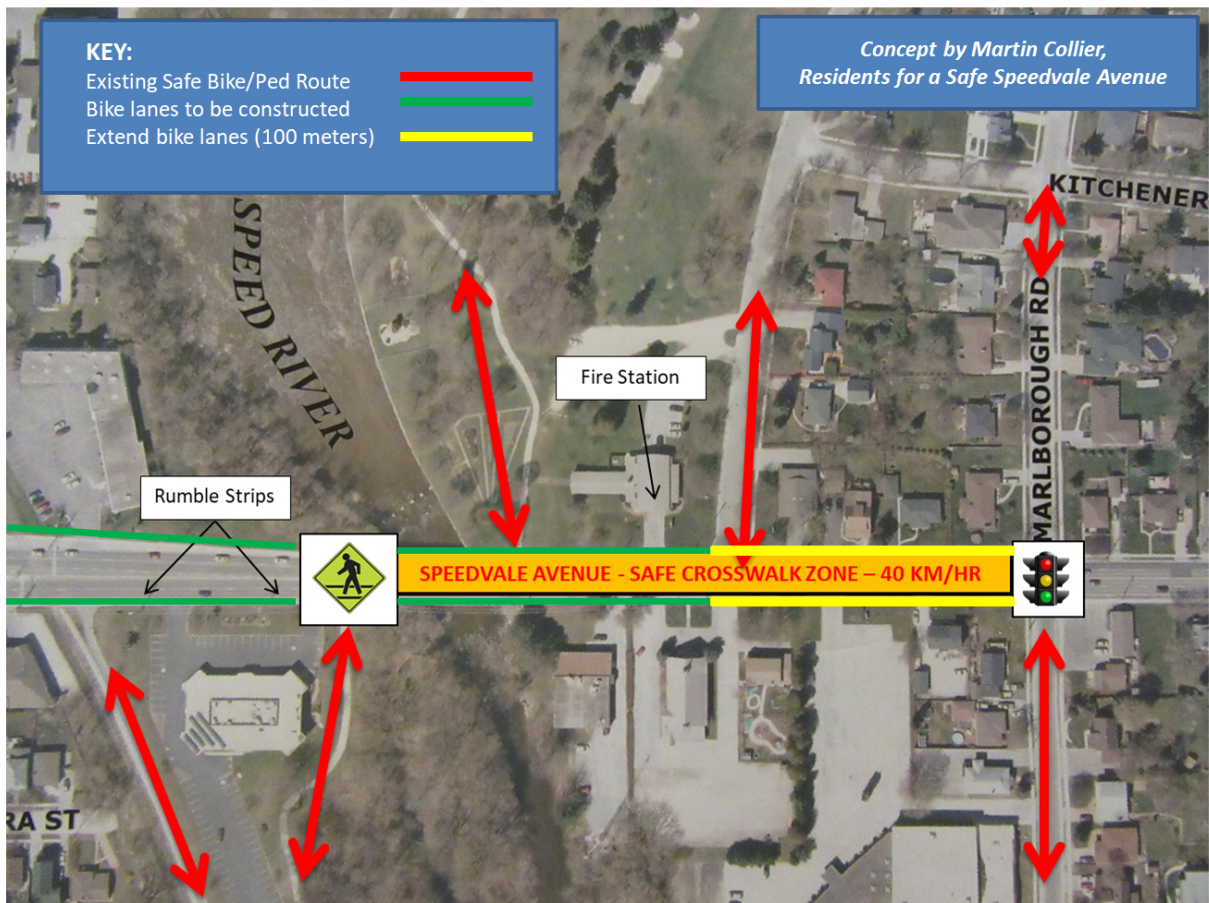
#### c) Design

- i) The safe zone would be similar to a school safety zone with a speed limit of 40 km/hr maximum (or preferably 30 km if the province allows it).
- ii) A large crosswalk zone would be created that extends from west side of bridge/river to Marlborough Road (220 meters).
- iii) The existing crosswalk and signalization in front of the fire station would be moved to west side of bridge. Traffic lights would be added at Marlborough Road.
- iv) The zone would be painted a bright colour to warn drivers they are entering the safe zone -- and preferably “raised”.
- v) East and west approaches should also include signage and rumble strips.
- vi) The reconstructed road will have bike lanes between Woolwich and Riverview. These must be extended 1 block to the new traffic light at Marlborough Road.

#### Benefits include:

- a) Addresses concerns and impacts regarding natural heritage feature destruction, access, and funding the Speedvale Underpass
- b) allows for safe east-west travel along this section of Speedvale at all times. Pedestrians, runners, cyclists and those in wheelchairs would be able to move across the street from north to south when crosswalk and traffic signals are activated.

- c) provides motor vehicles with safer ingress/egress from Marlborough Road, Riverview Drive and private driveways. Large fire trucks will have an easier time moving in and out of the station on the north side of Speedvale.
- d) renders the \$860,000 Speedvale “interim solution” and \$1.9 million Earl-Emma Bridge proposal redundant.
- e) saves millions in infrastructure costs, and staff time. The money saved could be used to install a similar “safe zone” design at other trail/road conflict locations throughout the city (e.g. Eramosa, MacDonnell)
- f) Refer to the graphic below for details.



4. **Null Alternative**

The Null Alternative was not systematically evaluated nor did it consider nor incorporate public concern in the evaluation.<sup>10</sup>

5. **Reconsider Bike Lanes on Speedvale**

During the Speedvale Bridge EA, the EEB was not considered nor evaluated as an alternative. Likewise, during the EEB EA, the alternative to reconsider bike lanes on Speedvale was not considered. With this lack of information, analysis and comparison, a confident decision is not possible.

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<sup>10</sup> Refer to **Appendix B Table 4.5, EA Evaluation of the Five Alternatives for Emma to Earl Street Bridge – revised to Include Public Comments and Concerns**



## **Appendix A**

### **Alternative Routes from Downtown to Bullfrog Mall**

## Alternative Routes from Downtown to Bullfrog Mall

In its May 17, 2017 presentation to the River Systems Advisory Committee<sup>11</sup>, , staff described the EEB “need” as follows:

*“1. Context: The following context, obtained through discussions with the City’s Transportation Demand Management Program Manager, should be considered:*

1. a) *In providing the Emma-Earl bridge, cyclists could have a continuous network of either paved trail or on-road bike lanes\* that are mostly flat and low-stress **to connect them between Bullfrog Pond Mall and Downtown.** Cyclists from east of the river will have a safe and comfortable route to access the Trans-Canada Trail network without having to use a busy arterial road with no cycling infrastructure, or going significantly out of their way to access the trail safely.*

*\* Emma and Earl streets are low volume residential streets. The volumes and speed of traffic are sufficiently low that the majority of cyclists of all abilities are comfortable riding in mixed traffic without dedicated lanes*

2. b) *Without the Emma-Earl Bridge, cyclists either have to travel along Stevenson Street with some long and steep grades or along Speedvale Ave with high volumes and speeds and no cycling facilities east of the river to connect them to Stevenson or any alternative north-south routes. “*

The maps and tables on pages 18-19 summarize the distance and elevation of four Alternate active transportation routes from downtown to Bullfrog Mall without having to use Speedvale, Eramosa or Stevenson.

Possible routes have been mapped that avoid major streets, that connect downtown with Bullfrog Mall. Distance and elevations are indicated on each route.<sup>12</sup>

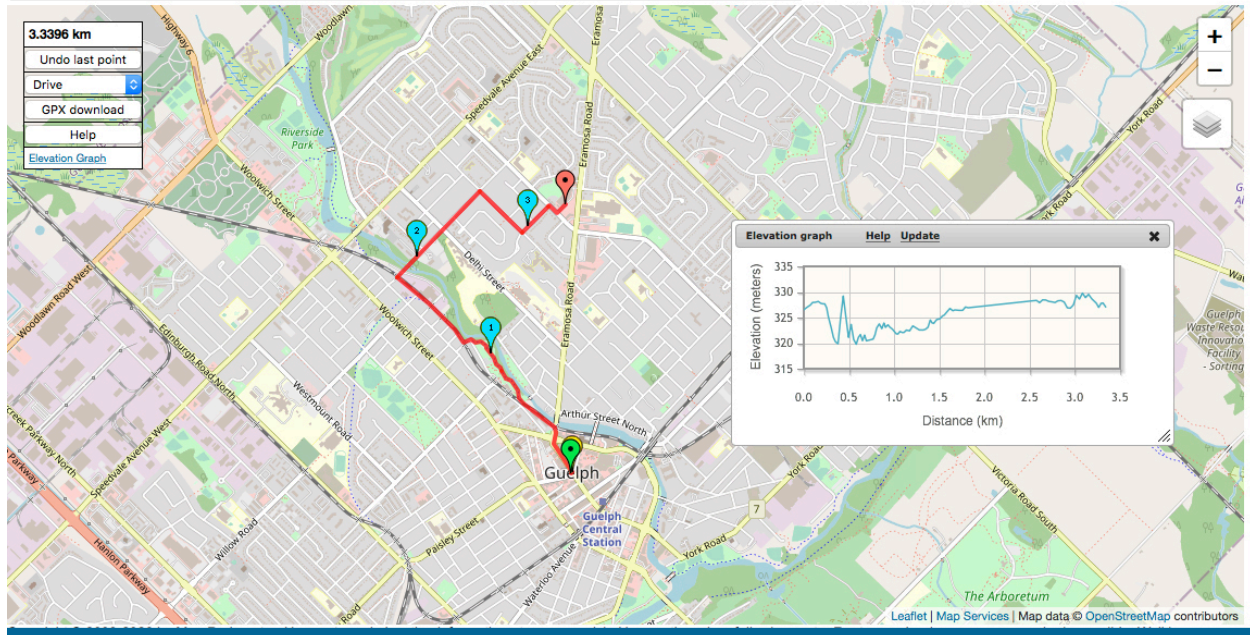
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<sup>11</sup> May 17,2017 (Appendix B Consultation Summary, Emma St. to Earl St. Pedestrian Bridge EA, November 21, 2019)

<sup>12</sup> Mappedometer.com used to map existing active transportation routes)

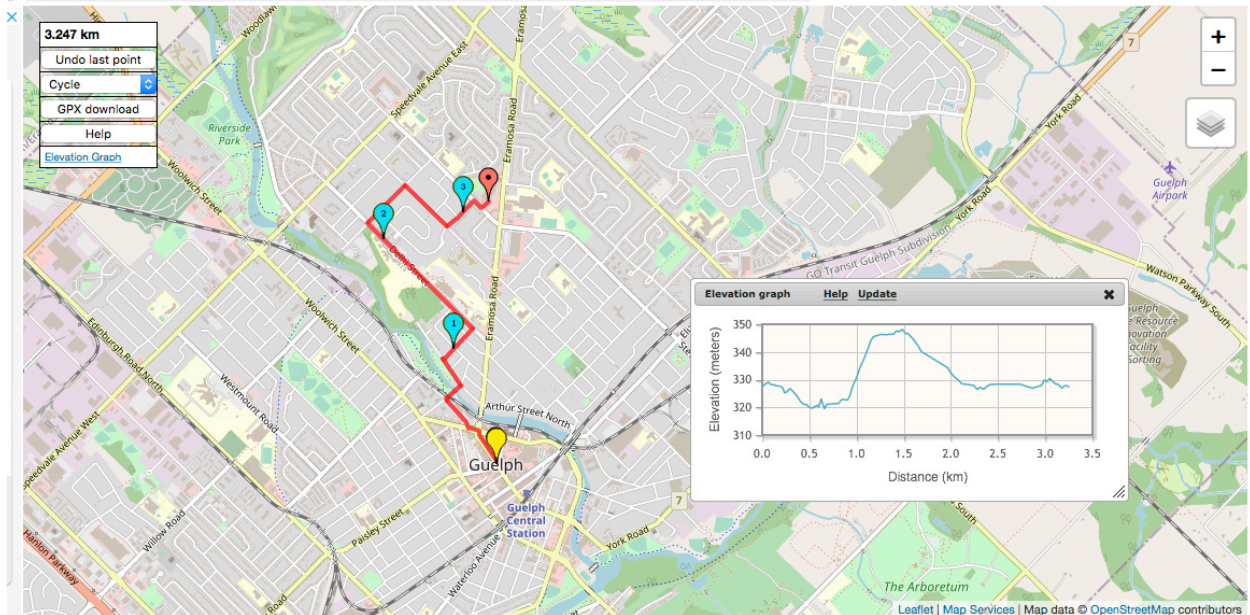
## Alternative Route 1

From downtown, along TransCanada Trail to proposed Emma Earl Bridge to Bullfrog Mall



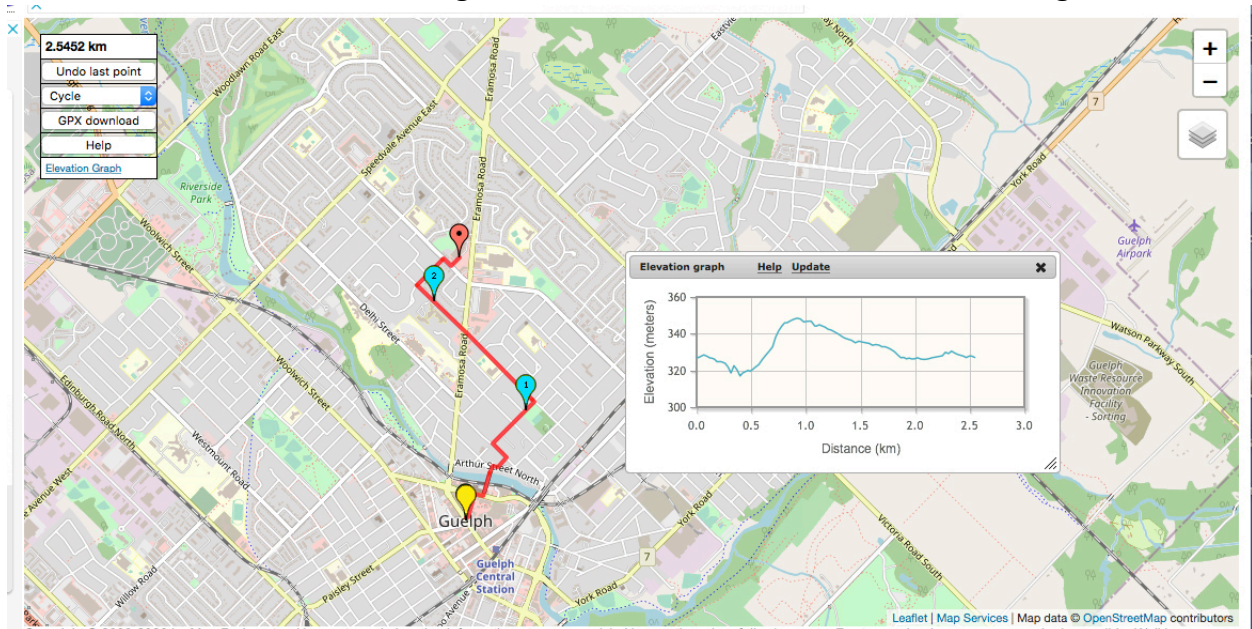
## Alternate Route 2

Downtown, across Norwich Bridge, NW on Delhi, to Bullfrog Mall.



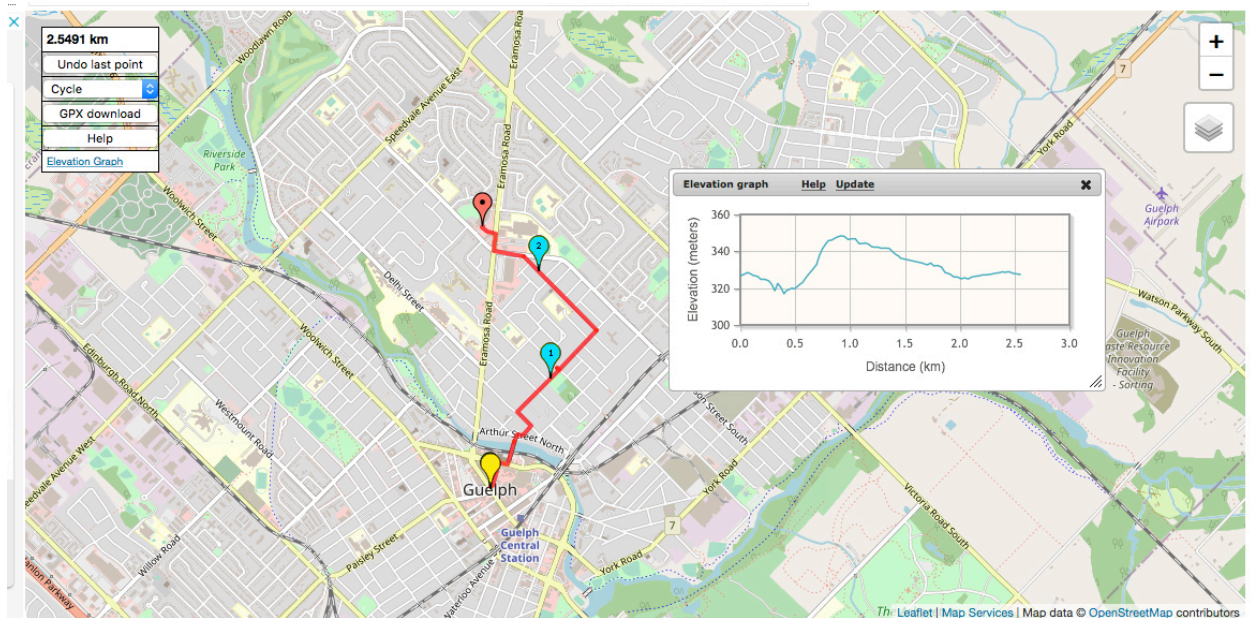
### Alternate Route 3

Downtown, across Heffernan Bridge, NE to Metcalfe, across Metcalfe to Bullfrog Mall



### Alternate Route 4

Downtown, across Heffernan Bridge, NE to Lane, across Lane to Bullfrog Mall



Route	Total Distance (km)	% increase in distance	Approximate Accumulative elevation
1 - Using proposed Emma Earl Bridge	3.3	24% <b>increase</b> in distance	33m
2 - Using Norwich bridge	3.2	22% <b>increase</b> in distance	33m
3 - Using Heffernen bridge	2.5		25m
4 - Using Heffernan Bridge	2.5		25m

## Conclusions

The Emma Earl Bridge increases the distance to travel from downtown to Bullfrog Mall by 24% with only an 8m difference in cumulative elevation.

This significant increase in distance using the Emma/Earl bridge is an obvious **inconvenience and deterrent** for cyclers and pedestrians.

This contradicts the TMP Principle that trails need to be convenient and destination oriented.

## **Appendix B**

### **Evaluation of Alternatives: Revised to Include Public Comments and Concerns**

## Revised Evaluation of Public Comments and Concerns

The blue highlighted areas indicate where changes have been made to the Evaluation of Alternatives in the Final EEB EA. The Yellow highlighted numbers provide reference to the detailed description of changes below.

Table 4.5, EA Evaluation of the Alternatives for Emma to Earl Street Bridge – revised to include public Comments and concerns

EVALUATION CRITERIA no alternatives “to” the undertaking considered (10)		NULL ALTERNATIVE		ALT 2b – Double Span Bridge (Overhead Hydro Relocation) (12)	
		Score	Explanation	Score	Explanation
Physical and Natural Criteria		12	In the Null Alternative ... the Natural Heritage system remains unaffected. from 2. Proposed Pedestrian Bridge Alternatives, Environmental Study Report Nov 21, 2019 by Aquafor Beech, Ltd	9	
Hydraulics & Flooding	Impact on conveyance of the Speed River	4	Existing hydraulic conveyance maintained	3	Potential impact under high flood flows due to new pier structure in floodplain. Mitigated by removing existing hydro pole.
Aquatic Habitat (8)	Impact on aquatic habitat	4	No impacts to warm water fish species. Appendix A, EIS determined there was no impact on Aquatic Habitat. The City has the responsibility to and has opportunity to remove upstream historic fill and restore wetland features.	3	Minimal impact due to removal of hydro pole and utilization of existing footprint for new pier within wetland. Opportunity to remove upstream historic fill and restore wetland feature.
Terrestrial	Impact on connectivity and quantity/quality of habitat	4	No impact to terrestrial habitat and vegetation. The City has the responsibility to, and always has opportunity to remove upstream historic fill and replant native species.	3	Vegetation / tree removal required for access and construction of new pier. Existing hydro corridor width maintained. Opportunity to remove upstream historic fill and replant native species.
Social and Cultural Criteria		14		6	
Public Safety	Impact on Public Safety (1)	3	No change to status quo - Negative impact on Speedvale Avenue	1	Allows for separation between Speedvale traffic and recreational users

	<ul style="list-style-type: none"> <li>• Transport trucks – Speedvale</li> <li>• Transport trucks – Earl</li> <li>• Vandalism/theft/drugs</li> <li>• Garbage</li> </ul>		<p>or alternate route for cycling</p> <p>No mitigation measures have been identified to accommodate public safety concerns so public safety concerns remain.</p> <p>Armtec Safety concerns considered</p>		<p>but users must eventually cross Speedvale after potential conflicts with 36-wheeler trucks entering/exiting Armtec plant on Earl Street.</p> <p>Potentially more vandalism, theft, and use of bridge as get-away route for criminals. (11)</p> <p>No traffic light at Marborough</p>
Landowner Impact	Impact on City of Guelph ROW and adjacent (2) landowners	4	<p>No change.</p> <p>Council resolution for bridge consideration not implemented This is not a valid impact explanation. This merely expresses that the City wants to consider a bridge as an alternative.</p> <p>Adjacent neighbours have repeatedly expressed negative impact concerns.</p>	1	<p>Increased pedestrian &amp; cyclist traffic to low volume Earl and Emma Streets.</p> <p>Sidewalks along Earl Street – sidewalks only considered for 30m from the Bridge to the TransCanada Trail. No Sidewalks exist along Earl Street from the TransCanada Trail to Dufferin Street nor from along Dufferin Street from Earl to Mac. See (7)</p> <p>Potential for increase in access of pedestrian and cycling traffic to Homewood grounds</p>
Benefits to Community	Access to trails, enjoyment of surrounding lands	3	<p>Existing opportunities for access from and to Downtown Trail see (3)</p> <p>Bike lanes are proposed along Eramosa</p>	2	<p>Data provided in this report clearly indicates that only a very few people benefit from the bridge as alternate trails that are more connected and convenient exist.</p> <p>Distance travelled using Emma Earl Bridge takes most pedestrians and cyclists significantly increases which contradicts principles of Trail Master Plan</p>
Cultural & Archaeological Impacts	Impact on areas of archaeological potential or built or cultural heritage	4	No impacts to existing heritage potential	2	Disturbance to area of potential archaeological significance associated with construction of pier.
<b>Technical and Engineering Criteria</b>		<b>14</b>		<b>8</b>	



Impacts on existing infrastructure (local)	Potential impacts on existing infrastructure (watermain, storm sewer, hydro, roadway)	4	No impacts on existing infrastructure	2	Some interaction and conflict with existing infrastructure.
Impacts on existing infrastructure (external) (9)	Potential impacts on alternative routes	2	Negative impact on Speedvale Avenue or alternate route for cycling but not if Safe Zone and underpass built.	3	Remainder of pedestrian/cyclist infrastructure appears to be unimpacted but users must still cross Speedvale. No traffic lights at Marborough
Lifespan of Works	Expected lifespan of alternative	4	No lifespan consideration	3	Bridge design for 50 year timeframe
Policy Conformity (4)	Conformity with City's Natural Heritage	4	Consistent with OP Natural Heritage System policies	0	Does not meet a number of NHS policies. Site specific OP amendment required, Permitting requirements for this alternative would typically involve comprehensive reviews by the GRCA, MECP and DFO to address construction proposed within GRCA's regulated area, potential destruction of Species at Risk habitat
<b>Economic Criteria</b>		<b>7</b>		<b>4</b>	
Capital Costs	One time cost to City	4	No capital costs, however, Speedvale Ave alteration may be required.	2	Moderate costs associated with double span box truss = \$1,640,895.60. May not include: <ul style="list-style-type: none"> <li>• Bridge lighting</li> <li>• Earl Street guarded sidewalks</li> <li>• Habitat management plan</li> <li>• Sidewalks along Earl Street and Dufferin Street that may require road/hydro alignment or land appropriation</li> <li>• Possible Armttec land expropriation for sidewalk.</li> <li>• Speedvale alterations may be required.</li> </ul>
<b>Operations &amp;</b>	Requirement for	<b>3</b>	No O&M costs, however, Speedvale	<b>2</b>	Minimal maintenance, 3 year

<b>Maintenance Costs</b> <b>(5)</b> <ul style="list-style-type: none"> <li>• Engineering/trains</li> <li>• Police</li> <li>• Habitat plan</li> <li>• Lighting</li> <li>• Garbage (by-law)</li> </ul>	regular, irregular or no maintenance activities as well as police and by-law patrol		Ave may be impacted. Following activities must be enhanced on existing Trans-Canada Trail: <ul style="list-style-type: none"> <li>• Policing</li> <li>• Lighting/monitoring</li> <li>• Garbage (by-law)</li> </ul>		monitoring program. Most maintenance to confirm bridge safety as well as: <ul style="list-style-type: none"> <li>• Policing</li> <li>• Snow removal</li> <li>• Ear sidewalk</li> <li>• Lighting/monitoring</li> <li>• Garbage (by-law)</li> </ul>
<b>TOTAL SCORE</b>		<b>47</b>		<b>27</b>	

**Footnotes:**

(1) Public Safety was recognized as a major concern in all public consultation meeting and communications as well as from Armtec.

(2) "Adjacent" was described at the September 28 Council meeting by Ken VanderWal, Project Engineer to include *"not only looking at the immediate landowners, we would be looking at impacts on Speedvale that are already discussed for land acquisition as well as other users of the trail system so it is a little of both, impact to land owners property-wise and the impact to citizens and landowners when using it (the bridge) and potentially other locations of the City as well."* This definition of "Adjacent" to include the whole City makes the definition of "Adjacent" meaningless. The definition used by staff describes the "Benefits to the Community" not adjacent landowners which usually refers to landowners in the direct vicinity of the proposed project

There is no documentation in the EEB EA to indicate that the Homewood was ever consulted. In a conversation that RSSA had with Homewood staff, concerns were raised regarding current pedestrian and cycling traffic that has negatively impacted the clients at their facility Homewood Centre. Increasing access through the EEB to this area, would attract more pedestrian and cycling traffic through the Homewood grounds and further impact their clients.

(3) see Proposed Cycling Network Map, cycling Master Plan, February 2012 and also see Progress Report on Guelph's Cycling and Walking Programs, Aug 2019, EX-1 Recommended Active Transportation Network. Neither of these documents outline need for EEB in proposed trail network

(4) In the Final EA document, the ranking for Policy conformity is changed to only include ranking from 0-2. No justification for the change in ranking is given. Policy Conformity was considered Physical and Natural Criteria in 2017 evaluation

(5) Ongoing significant increase in crime, garbage, lack of lighting and lack of police monitoring along the TransCanada trail and proposed bridge was highlighted as a concern at public meetings and in communications.

(7) Sidewalks along Earl Street between the TransCanada Trail and Dufferin and along Dufferin from Earl to Mac will require road Alignment. This interferes with Armtec truck traffic need for a straight road OR may require privately owned land appropriation

(8) Snapping turtle habitat and nesting areas mapped incorrectly in the Emma/Earl EA. Snapping Turtles nest along the Armtec fenceline and also in the ditches along Earl Street from the Speed River to the TransCanada Trail

(9) Criteria not used in the 2017 Evaluation but secretly added to 2020 report without public input. By giving bridge Alternative 2b a score of 4 and the Null Alternative a score of "0", it moved 2b two points ahead of the Null Alternative.

(10) No consideration for using easily understood evaluation criteria, process not clear and rational, did not share complete information with all interested persons to support conclusions (see 3.2.3 Code of Practice, Clarity and Consistency. Also see Public comments from Jeff Huber at September 8, 2020 Council meeting

(11) The TransCanada Trail (TCT) was built in 2010. Since then, landowners living in the vicinity have experienced a dramatic increase in crime (theft, vandalism, assault).

The TCT is used as a corridor to evade police. Police are commonly seen travelling up and down Dufferin and along side streets to get a view of the trail in attempts to capture criminals. Police Officers have anonymously told us the EEB will provide a third way to escape from the crime scene. Yet there is no money in the Police Budget to monitor the TCT, EEB or any other trail in the city.

(12) Public was never made aware of Alternative 2b during public consultations.

Mitigation measures have been outlined to increase the ranking score of the Physical and Natural Criteria but have not been identified in the Social and Cultural Criteria thereby skewing the ranking scores.