



Manitoba Trucking Association

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July 31, 2024

Councillor John Buffie
City of Selkirk
200 Eaton Ave.
Selkirk, MB R1A 0W6

sent via email: citizensupport@cityofselkirk.com

Re: Winnipeg Metropolitan Region Plan20-50 – Outstanding Issues Regarding Transportation

Dear Councillor Buffie,

The Manitoba Trucking Association (MTA) is a member-based organization that since 1932, has represented the commercial trucking industry in Manitoba. Our member companies operate approximately 75% of the commercial trucks licenced in Manitoba, enabling trade within and well beyond the borders of the WMR. Manitobans rely on our industry to put groceries on store shelves, medicine in hospitals, and to supply our farms and factories with the commodities they need. It has been said that the economy is the horse that pulls the social cart. What is also true is that the economy is pulled by trucks.

The MTA is writing this letter for two reasons. First, we wish to express our thanks and encouragement for the ongoing work by yourself and other WMR Directors to complete the Plan20-50 for the WMR. The MTA recognizes the importance of regional planning for the health and growth of the economy, the sustainability of our infrastructure, and the prosperity of our people.

It is with this in mind that the MTA is also writing to communicate **several concerns regarding Plan20-50**, and to request that members of the **WMR Board amend the text of Plan20-50 before it receives third and final reading.**

The MTA was pleased with an earlier version of Plan20-50 that was shared in draft form and previously approved by the WMR Board, and we saw no need for further consultations. When the current version of Plan20-50 was released, the **MTA was surprised to see the changes that were made.**

In its current form, **Plan20-50 does not meet the needs of the trucking industry**, and our capacity to support the greater economy. To ensure that the regional economy can continue to grow and function, our roads and highways need to have greater protection, and **the safe and efficient movement of goods by truck needs to be prioritized in transportation planning. Both have been greatly weakened by the changes that were made to Plan20-50 for its first reading by the WMR Board.**

To ease the amendment process, our specific requested changes and the reasons for them are provided in an attachment to this letter. The MTA's key concerns include:

- Prioritize goods movement by truck in regional transportation planning
- Strengthen protection for all highways and roads
- Leave goods movement routing choices to trucking companies and their customers
- Identify "Metro Roads" within the City of Winnipeg
- Separate municipal road standards from street typologies

We speak to these concerns because we recognize and understand the importance of commercial trade to the survival and prosperity of the economy. The MTA has over 300 member companies representing more than 10,000 employees, about 25% of the for-hire trucking companies and approximately 75% of the commercial trucks licensed in Manitoba. Trucking companies in Manitoba earn approximately \$4 billion in revenue annually, enabling local, national, and international trade for Manitoba, whether in agriculture, processing, manufacturing, or consumer-oriented businesses.

Every year, commercial trucks move over \$21 billion in goods and materials into, out of, and within the Winnipeg Region. Goods movement by truck is the lifeblood of the regional economy, the provincial economy, and the municipalities that make up the WMR. Throughout the Winnipeg Region and beyond, MTA members haul equipment, grain, fertilizer, seed, and other bulk commodities used by grain producers. They also haul livestock, eggs, bulk milk, and other agricultural products.

The MTA urges you to consider our requested changes to improve Plan20-50. If you would like to discuss matters further, please do not hesitate to contact us.

Sincerely,



Aaron Dolyniuk
Executive Director

Attachment: Changes Needed to WMR Plan20-50

The MTA's requested changes to Plan20-50 prior to second reading are organized in this attachment by the following headings:

- Prioritize goods movement by truck in regional transportation planning
- Strengthen protection for all highways and roads
- Leave goods movement routing choices to trucking companies and their customers
- Identify "Metro Roads" within the City of Winnipeg
- Separate municipal road standards from street typologies

For each heading, one or more current provisions in Plan20-50 are shown in *italics*, followed by the reasons for needed change and/or recommendations for re-wording, the latter of which are provided in **bold** typeface.

Prioritize goods movement by truck in regional transportation planning

1.8.2 To guide regional transportation planning, the WMR will lead regional transportation master planning which at a minimum:

None of the items that follow this statement in the first reading of Plan20-50 speak to the prioritization or requirements of trade, or goods movement by truck. There are statements on active transportation infrastructure, regional transit, park and ride facilities, and zero emission vehicles, but nothing that specifically identifies goods movement by truck.

Any transportation master planning for the WMR needs to include and prioritize goods movement by truck. For this reason, the following clause needs to be inserted in Plan20-50:

- a) Ensures that goods movement by truck is accommodated safely, efficiently, and effectively on all highways and roadways in the WMR region.**

1.8.1. a) Establish a common regional road hierarchy with consideration for safety, efficiency, connectivity, and reliability of the regional transportation network including identified Metro Roads as per Schedule A-6...

Plan20-50 needs to specifically identify trade, goods movement vehicles, service vehicles, and emergency vehicles as the priority for the common regional road hierarchy. It should not be necessary to argue this point in any future regional transportation plan.

1.8.1. a) Establish a common regional road hierarchy that prioritizes the needs of goods movement vehicles, service vehicles, and emergency vehicles, with consideration for safety, efficiency, connectivity, and reliability of the regional transportation network including identified Metro Roads and all other roads and highways in the region.

Section 1.8.3 of Plan20-50 originally included provisions that were amended and moved to Section 2.4. This needs to be corrected, to ensure that the support provided by goods movement to the regional economy is established as priority for regional transportation planning.

Strengthen protection for highways and roads

2.4.2 To protect Metro Roads for priority access, municipal development plans will limit direct access to Metro Roads and support appropriate intersection upgrades and public transit connections where applicable.

“Priority access” is not defined in Plan20-50, and needs to be defined to ensure that *Metro Roads* are actually protected. The reasons for protecting roads and highways (for example, the safety, efficiency, and effectiveness of goods movement) also need to be stated.

Metro Roads are not the only highways or roads in the region that need to be protected. All roads and highways in the WMR are used to enable goods movement, whether for agricultural, industrial, or commercial land uses. All of these roads and highways need to be protected for this purpose.

To protect all roads and highways for safe and efficient goods movement in the region, municipal development plans will establish objective criteria for managing and limiting the placement of entry and egress lanes from private property to public rights of way (PROWs). These criteria will include at a minimum:

- The measured distance between a PROW intersection and the entry or egress lane
- The weight limit classification and speed limit established for a PROW by the Province of Manitoba
- In urban municipalities, the classification of a PROW as a major or minor arterial or collector.
- The total volume of motor vehicle traffic, measured by average annual daily traffic counts
- The total volume of medium and heavy truck traffic, measured by average annual daily truck traffic counts
- Whether the PROW accommodates one-way or two-way traffic
- Whether the PROW physically divides one-way from two-way traffic

Protecting highways and roads for goods movement by truck needs to be placed the transportation infrastructure section of Plan20-50, under 1.8.2, making this is a clear priority when municipalities or the WMR undertake transportation planning, or make planning decisions.

2.4.3 To protect for the safe movement of goods and economic development, land use planning and development will be coordinated to recognize the existing rail network and enhance its integration with existing and future Metro Roads, Regional Employment Areas, local employment areas, and other industrial land uses...

2.4.4 To ensure land use compatibility, the Winnipeg James Armstrong Richardson International Airport and other airport lands in the region:

- a) Will be protected from land use and development that may adversely impact their operations and potential for future expansion, as per Transport Canada and Province of Manitoba regulations.*

Statements 2.4.3 and 2.4.4 a) also need to be applied to *Metro Roads*, and all other roads and highways in the region, using the same specific language and reasoning, and need to be re-worded as follows:

To protect for the safe movement of goods and economic development, land use planning and development will be coordinated to recognize the existing highway network, including but not limited to *Metro Roads*, to enhance existing and future employment areas, and other industrial, agricultural, and commercial land uses.

To ensure land-use compatibility, *Metro Roads* and other highways in the regional road network designated by Manitoba Transportation and Infrastructure as RTAC routes, will be protected from any land use or development, that may adversely impact their operations and potential for future expansion.

These statements also need to be included in the Transportation section 1.8, to ensure that they are included as criteria for regional transportation and land use planning.

Leave goods movement routing choices to trucking companies and their customers

2.4.1 To support economic competitiveness and trade, municipalities will plan for the efficient movement of goods and services to, from and within the region with a focus on:

- c) Ensuring the effective and efficient movement of goods into and out of significant local employment areas, including industrial, commercial, and agricultural areas; and*
- d) Collaborating with the province, WMR and other stakeholders to coordinate the planning and development of priority goods movement routing.*

Section 2.4.1 c) is problematic because it does not specify what “significant” means. This leaves too much subjective judgement to planners and decision-makers to interpret the meaning of “significant.”

This section is also problematic because the definition of *Local Employment Area* in Plan20-50 is too restrictive, referring to “locally significant business and economic activities.” This definition does not recognize that any “local” business establishment, institution, or economic activity frequently has supplier and customer relationships that are regional, national, or international. What appears to be a “local” establishment usually has more to it than meets the eye, and planning documents need to recognize this.

For these reasons, 2.4.1 c) should be re-worded as follows:

Ensuring the effective and efficient movement of goods and services between shippers and/or receivers of those goods and services within the Region.

Section 2.4.1 d) is problematic because it does not recognize that the prioritization and routing of goods movement is done by trucking companies for their customers. The trucking industry is not asking municipalities to do this work. The trucking industry needs municipalities to protect and maintain roadways for the safe and efficient movement of goods, thereby enabling the trade and commerce that provides jobs and builds the municipal tax base. For these reasons, Section 2.4.1 d) should be removed from Plan20-50.

Identify “Metro Roads” within the City of Winnipeg

As shown on Schedule A-6, the Plan20-50 map of Metro Roads does not include many high-volume or arterial road segments within the boundaries of the City of Winnipeg. For example, there is no “Metro Roads” identification for Route 90, Lagimodiere Boulevard, Portage Avenue, or Main Street. It is not clear why this is the case, as there is no explanation for this omission.

The issue of identifying “Metro Roads” is less important than protecting all roads and highways for goods movement and recognizing their importance for this purpose. If the intent of Plan20-50 is to protect highways, then this should be stated in a simple and straight-forward manner, without excluding one particular roadway over another.

Separate municipal road standards from street typologies

1.8.1. b) Establish common municipal road standards for modification by municipalities, including typologies for street standards that are designated for contexts that are walkable mixed-use and drivable single-use.

This section of Plan20-50 mixes two different things that need to be separated. Municipal road standards to accommodate the weights and dimensions of motor vehicle traffic, especially trucks, are not the same thing as typologies for streets envisioned by urban designers.

Public rights of way, and the roads that occupy them, are themselves a land use. They are the land use that serves all other land uses. All public rights of way must accommodate trucks, so that all other land uses can receive services that are provided by truck. This includes emergency services, pick-ups and deliveries, utility servicing, solid or liquid waste management, and any other service provided using a large truck.

Road standards exist to maintain consistency in safety, efficiency, effectiveness, and durability, and physical accommodation for the weights and dimensions of motor vehicles, particularly trucks. Road standards ensure that the functional requirements of trucks are met, and by extension, ensure that other land uses can receive the goods and services provided by truck.

As an example of a functional requirement, the widths of lanes at road intersections must be able to safely accommodate the swept path of a turning 5-ton truck, not just the tracking of the truck's tires. Another example is the need for dumpster trucks to manoeuvre safely and efficiently on roads or back lanes when servicing property.

Plan20-50 needs to ensure that the functional capacity of roads, established through road standards, enables goods and services to be provided to property by truck. For this reason, the functional requirements of truck movements are the most important priority in establishing common road standards throughout the Region.

This is also why road standards need to be prioritized, and separated from street typologies in Plan 20-50, with the following recommended re-wording:

1.8.1. b) Establish common municipal road standards that:

- 1) include safe geometric and physical accommodation for the weights and dimensions of motor vehicles, particularly trucks and emergency vehicles**
- 2) enable regional consistency in traffic safety, efficiency, effectiveness, and durability**