

Rodney Northey
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July 12, 2019

Via E-Mail: ceaa.miltonlogisticshubpanel.acee@canada.ca

Lesley Griffiths, Panel Chair
Milton Logistics Hub Project Review Panel
c/o Canadian Environmental Assessment Agency
160 Elgin Street
Ottawa ON K1A 0H3

Dear Ms. Griffiths / Members of the Review Panel:

Re: Milton Logistics Hub Project – Reply to CN response to undertaking #15

Attached please find the Halton Municipalities' reply to CN response to Undertaking #15 regarding the 2008 BA report and the issue of traffic effects from the 2008 CN proposal compared to the proposed CN Milton Logistics Hub Project.

Sincerely,

Gowling WLG (Canada) LLP
<Original signed by>

Rodney Northey



Public Works Department
1151 Bronte Road
Oakville ON L6M 3L1

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Via E-Mail: ceaa.miltonlogisticshubpanel.acee@canada.ca

Lesley Griffiths, Panel Chair
Milton Logistics Hub Project Review Panel
c/o Canadian Environmental Assessment
Agency
160 Elgin Street
Ottawa, ON K1A 0H3

Dear Ms. Griffiths / Members of the Review Panel:

**Re: Milton Logistics Hub Project – Response to June 28, 2019 CN Memo
Undertaking #15**

I write this letter on behalf of the Halton Municipalities in response to the June 28, 2019 memorandum from Amy Jiang to Darren Reynolds, accepted by the Panel as Exhibit 10 to the public hearing record for the Milton Logistics Hub Project on July 10, 2019 (CEAR# 937) (the “**June 28, 2019 memo**”).

My response is made in consultation with Mr. Alvaro Almuina, one of our transportation experts. During the traffic presentation on June 26, 2019, Mr. Almuina submitted to the Panel that there would not be roughly comparable volumes of heavy- truck traffic between the 2008 Concept contained in the 2008 BA Group Study and the current proposed Project. BA Group claims in its June 28, 2019 memo that, “Mr. Almuina is, in fact, incorrect in this assertion.”

It is very important to understand why the proposed Project is different from the 2008 Concept. The June 28, 2019 memo purports to compare the 2008 Concept to the proposed Project. However, the two projects are fundamentally different and cannot be compared for the following reasons:

- 1) Principal Vehicles:** In the 2008 Concept the primary trip generation is predominantly cars. By contrast, the proposed Project’s primary trip generation is predominantly by heavy trucks.
- 2) Types of trips:** The 2008 Concept is primarily employee commuting which could take a variety of forms including cars, public transit and active transportation. By

Regional Municipality of Halton

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contrast, the proposed Project is primarily heavy trucks, majority of which are going to/from Provincial highways.

- 3) **Timing of trips:** The 2008 Concept, as a rail-serviced industrial park, would generate typical commuter trips, peaking at morning arrival times and after-work departures. The Project, as an intermodal terminal, would in contrast generate continuous truck trips all day.
- 4) **Route origins and destinations of those trips:** In the 2008 Concept, trips would generally be short and more compact. By contrast, the trucks from the Project will traverse the Town, Region and beyond. Further, traffic from the 2008 Concept would have flowed counter to the peak direction, thereby not increasing congestion. By contrast, the truck traffic generated by the proposed Project would flow in the same direction as peak direction, thereby increasing congestion.

These differences matter. They result in adverse effects within the Region that will significantly impact those who live, work and visit Halton, as the Halton Municipalities have outlined in their submissions.

Mr. Almuina has elaborated on the technical differences between the 2008 Concept and the proposed Project in the attached letter.

We thank you for this opportunity to respond to the June 28, 2019 memo and Canadian National Railway Company's provision of new information, interpretation and critique.

Yours very truly,

"Original Signed by"

Lisa De Angelis, MCIP, RPP, P.Eng.
Director, Infrastructure Planning & Policy
Halton Region Public Works

July 12, 2019

Lisa De Angelis
Halton Region
1151 Bronte Road
Oakville, Ontario L6M 3L1

Dear Ms. De Angelis:

**Re: Analysis of June 28, 2019 CN Memo
Undertaking #15**

I have been asked by the Halton Municipalities to consider the BA Group's June 28, 2019 memorandum (CEAR# 937) (the "**June 28, 2019 memo**"). For the following reasons, BA Group's June 28, 2019 memo does not change my opinion that the 2008 Concept and the current proposed Project are fundamentally different, including in terms of traffic composition and distribution:

1. Truck trips cannot be directly compared between the 2008 BA Group Report and the proposed Project:

The 2008 Concept analyzed in the 2008 BA Group Report and the proposed Project cannot be directly compared from a transportation perspective. They are two different developments with their own unique characteristics that cannot be likened. Table 4 in the 2008 BA Group Report presents the trip generation for the concept (see below).

**Table 4
Site Traffic Generation – Initial Development Phase**

	AM Peak Hour			PM Peak Hour		
	In	Out	2-way	In	Out	2-way
Selected Trip Rate (Per Acre)	4.47	0.91	5.38	1.06	4.04	5.10
Number of Mixed Vehicle Trips (136 Acres)	610	125	735	145	560	695
Selected Truck Percentages (Trucks = 2.5 PCU)	15%	35%	-	55%	20%	-
Total Site Trips (PCU)	745	195	940	265	715	980

The trip rates are shown for the AM and PM Peak hour in the first row. These rates are derived from the proxy site data presented in Appendix B. The rates are multiplied by 136 acres giving the in and out mixed traffic (auto, medium and trucks) for each hour. BA Group then multiplies a percentage of trucks (medium and heavy) for inbound and outbound trips. As shown in the table, the truck

percentages range from 15% to 55%, compared to 100% for the proposed Project, as shown in Table 1 of Appendix E.17 – Milton Logistics Hub Technical Data Report for the proposed (see below).

TABLE 1 FORECAST TERMINAL-GENERATED HEAVY-TRUCK TRIPS

Hour (starting)	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	TOTAL
Hourly Truck Trips Inbound and Outbound (per BIT volume averages)																									
% of total daily trucks at inbound gate	1.7	1.5	1.6	2.1	3.8	5.6	5.9	4.1	4.7	5.4	5.8	6.2	6.4	6.2	5.6	5.5	5.4	5.3	5.4	3.6	2.8	2.1	1.5	1.8	100%
Inbound trucks	13	12	13	17	30	45	47	33	38	43	47	50	51	49	45	45	43	43	43	29	22	17	12	14	800
% of total daily trucks at outbound gate	1.5	1.5	1.5	1.6	2.3	3.8	5.6	5.4	5.0	5.0	5.5	5.9	6.1	6.0	6.0	5.6	5.8	5.7	5.4	4.8	3.7	2.7	2.0	1.8	100%
Outbound trucks	12	12	12	13	18	30	45	43	40	40	44	47	49	48	48	45	46	45	43	38	30	22	16	14	800

Table 1 of Appendix E.17 – Milton Logistics Hub Technical Data Report for the proposed Project presents the site trip generation for the proposed Project. As shown, 100% of the trip generation on Britannia Road is heavy truck traffic. Although the absolute number of the truck trips is similar for the PM Peak, this in itself does not make the site truck generation equal over a 24 hour period.

In addition, Passenger Car Units (PCUs) are used for computational analysis of intersection level of service. They do not suggest that in any other respect a truck behaves like passenger cars on the roads.

In summary, the trip generation from the proposed Project is 24/7 and is uniform i.e. 100% heavy trucks. In the 2008 BA Group Report, the truck trip generation is a mix of heavy and medium trucks. The 2008 BA Group Report states a PM peak assumption of 20% outbound and 55% inbound trips are by truck which differs from the Project’s 100% inbound and outbound trips by heavy truck. The additional interpretation of the traffic analysis in the June 28, 2019 memo focuses on the peak hours only, whereas the Project has continuous heavy truck traffic all day as presented by CN in Slide 10 of their Traffic & Safety Assessment presentation of June 26, 2019.

2. The composition and travel patterns of traffic generated from the 2008 Concept – a rail-serviced industrial park – is fundamentally different than the composition and travel patterns of traffic generated from the proposed Project – an intermodal terminal

The June 28, 2019 memo states that the concept addressed in the 2008 BA Group Report was “rail-served industrial use”. This is not entirely accurate, as the 2008 BA Group Report, Section 3.1 Development Context speaks to “industrial uses”, which include rail and non-rail serviced parcels (20% non-rail parcels, 80% rail-access parcels).

The composition and travel patterns of the traffic generated from a rail-serviced industrial park with both rail and non-rail serviced parcels is varied, and would generate a diverse mix of trips and travel patterns. Each property or business would be unique and have its own travel behavior. With a projected higher number of employees accessing the park, there is a choice of modes to address

travel demand from the trips generated, taking advantage of planned investment in active transportation infrastructure and public transit. Furthermore, rail-serviced development could have raw materials delivered by rail and finished product leaving by rail, with no impact on the road network whatsoever.

In contrast, the composition and travel patterns of the traffic generated from the proposed Project is uniform. It is composed almost exclusively of trucks, the majority of which are destined to/originating from the provincial highway system, with no opportunity for alternative modes of travel.

3. The proposed Project, unlike the 2008 Concept, has very limited access options which creates more congestion

According to the 2008 BA Group Report, the 2008 Concept would have resulted in traffic from the site spreading out more evenly onto the road network, avoiding congestion (see Figure C-3 from the 2008 BA Group Report). BA Group's June 28, 2019 memo states that the initial development phase contemplated in the 2008 BA Group Report included two un-signalized site accesses, which is comparable to the proposed Project. However, the site was planned to be built out in phases over at least 20 years and would ultimately have had multiple access points (see Figure 1 from the 2008 BA Group Report). This is due to the anticipated industrial park having multiple local roads to access various businesses/properties. The Phase 1 accesses were on First Line and offered distribution of site traffic to the north and south as the majority of the trip generation was by passenger vehicle, which can travel on all roads in the network. The traffic would have already been diluted by the time it reached Britannia Road where it would then continue north for non-truck traffic, or split east and west. Hence by the time traffic reached Tremaine Road, for example, the traffic from the site could be as low as 25% of the total site generation. In contrast, with the Project, the traffic generation would be much higher at Tremaine Road as according to CN, this will be a desirable route for trucks to reach Highway 401.

4. The proposed Project, unlike the 2018 Concept, does not meet the objectives of *Sustainable Halton* identified in the 2008 BA Group Report:

The 2008 BA Group Report discusses how the 2008 Concept meets objectives of *Sustainable Halton* in Section 2 "Transportation Attributes of the Plan". BA Group submitted that the 2008 Concept met the following objectives:

- 2.1 *Supports compact travel patterns within Halton Region:* "The location of the proposed CN industrial park is expected to exhibit a relatively high internalization rate within Halton Region and thus support compact travel patterns"
- 2.2 *Makes efficient use of available road network capacity:* "The central location of the CN's lands within Halton Region and the directional nature of employment traffic patterns can take advantage of off-peak direction flows on major arterial links to area highways"
- 2.3 *Exhibits low peak hour traffic characteristics:* "... the surveyed predominately rail-service sites appear to somewhat generate reduced traffic volumes"
- 2.4 *Capitalizes on Planned/Potential Inter-Regional Linkages*
- 2.5 *Supports Planned Public Transit Initiatives"*

The proposed Project does not meet these objectives.

- a) **The travel patterns from the proposed Project will traverse the Town, Region and beyond.** This is in contrast to the 2008 Concept where traffic patterns were anticipated to be more

compact. The 2008 BA Group Report states in Table 5 (see below) that fully 50% of trips would have been distributed within Halton, and 25% distributed to Niagara/Hamilton/Guelph, which differs significantly from the distribution presented in Figure 4 of Appendix E.17 – Milton Logistics Hub Technical Data Report for the proposed Project. As noted there, the composition and travel patterns of the traffic generated from the proposed Project is uniform, with trips destined to/originating from the provincial highway system (Highway 401), composed of heavy trucks with no opportunity for alternative modes of travel.

**Table 5
Trip Distribution – Initial Development Phase**

To/From	%
Toronto	5%
York/Durham	5%
Peel	15%
Halton	50%
Niagara/ Hamilton/ Guelph	25%
Total	100%

- b) **The proposed Project would undermine the efficiency of the available road network.** This is unlike the 2008 Concept which envisioned optimizing roadway capacity during the peak hour as a result of generating trips that would have moved in the opposite direction of most traffic. Traffic moves generally from west to east in the AM peak and east to west in PM peak. Trips to and from the industrial park for employees would have been in the opposite direction. In contrast, the truck trip generated by the proposed Project would flow in the same direction as peak direction flows, thereby increasing congestion.

- c) **The proposed Project would undermine public transit initiatives.** As previously stated, the 2008 Concept would have generated travel demand that could be accommodated by other modes such as public transit and active transportation. The proposed Project, on the other hand, does not encourage alternative modes of transportation and does not support the multi-modal plans for the Britannia Road corridor.

Based on the above, the comparison made in Table 2 of the June 28, 2019 memo is misleading. The volume of heavy trucks concluded in Table 2 is based on a number of flawed assumptions. The proposed Project has very different impacts on traffic in the Region than the 2008 concept would have had, as a result of different: 1) types of trips, 2) timing of trips, and 3) route origins and destinations of those trips.

Thank you for this opportunity to elaborate on the key differences between the 2008 concept and the proposed Project.

Sincerely,

“ORIGINAL SIGNED BY”

Alvaro L. Almuina