

Attn: Hart Solomon
Manager
Traffic Engineering & Operations
Operations & Maintenance Division
Public Works Department
City of Hamilton

Dear Mr. Solomon:

Re: Truck Route Study

By way of introduction, as you know, Hamilton Chamber of Commerce is the oldest, largest, and most broadly based business organization extant within the Greater Hamilton Economic Region. Today, we comprise almost 2,100 members who represent over 1,200 businesses of all sizes and sectors that collectively employ some 75,000 Hamiltonians full time from all parts of Hamilton, and indeed, many more beyond. As you know, we do strongly feel that a comprehensive Truck Route Study for this City is long overdue and this strongly support the underlying need for this initiative. Therefore, we do thank you for conducting this much-needed study, and the opportunity for us to provide input in this crucial process.

During the last Technical Advisory Committee (TAC) meeting on September 17, 2009, three alternatives were presented outlining a proposed Truck Route system:

- Alternative 1 outlines the current system in place today.
- Alternative 2 outlined the Truck Route system based on feedback aggregated from Public Information Centres (PICs) and individual meetings with City Councilors. And
- The final Alternative (3) – the preferred Alternative – outlined a merging of a Truck Route system derived from criteria developed by IBI Consulting.

We do believe that our representatives in attendance at the above noted meeting did provide specific feedback on some of our concerns regarding specific routes. That feedback is summarized as an attachment to this letter. However, if you do require any further clarification in that regard, I would refer you to the our standing Transportation Committee Chair, [Daniel Rodrigues](#), who can be generally be reached at (905) 966-0508, or [drodrigues@mountaincable.net](mailto:d Rodrigues@mountaincable.net). (Incidentally, Dan is authorized to officially represent the Chamber in this matter in any future meetings or dialogue, in the absence of either myself, or John Dolbec our CEO.)

A request was made at that meeting, I understand, asking that the Chamber provide feedback on the presenting options, with a specific recommendation as to the preferred option, chosen from the three (3) presented and summarized as above.

However, on reviewing the three alternatives presented, we are concerned that the direct linkage of the referenced Study to the City's draft economic development strategy and the recently approved new Official Plan does not appear to be evident, which to us, should be a primary fundamental starting point to a study of this sort and import. Further, we commend you, and your consultants, as well, to the

recent McMaster Institute for Transportation and Logistics (“MITL”) Gateway Study, which is strongly supported by the Chamber. In our view, the Truck Route Study should support and strengthen the Hamilton Gateway concept and MITL recommendations, which we view as a crucially strategic initiative.

Further, in our view, any effective truck route study also needs to take into account what impact the planned one way/two way street conversions, and other traffic calming initiatives that may be under consideration may have on effective goods movement, so vital to this City, as a centre for our success in the advanced manufacturing cluster.

In short, the Chamber views transportation, particularly comprehensively planned goods movement, as an key basic and fundamental economic enabler. As such, we would view any proposed alterations to the existing Truck Routes must be driven by the anticipated jobs and prosperity development needs of the City, particularly to effectively service the needs of employers and potential employers. In brief, the fundamental purpose of any truly effective Truck Route Study to act as an enabler to help revitalize employment lands, particularly, in the Northeast end of the City; plus, provide effective linkage with future designated sites for such development. Thus, a truck rout study, with greatest respect, cannot be done in isolation of these broader strategic considerations. The Chamber views this study of strategic import.

In addition, our opinion is that this Study requires much more extensive pro-active consultation with the actual providers, including (but not restricted to) perhaps the Ontario Trucking Association, the Southern Ontario Gateway Council, and MITL. Shippers and receivers of goods need also to be proactively and thoroughly consulted. At this time, the Chamber feels that there is still extensive work to be done in determining the optimum routing system, and therefore would like to reserve official support for any alternative unless and until more feedback can be garnered, specifically from trucking companies, manufacturers, and other users of the transportation industry, as above. As we have representatives of all these sectors, and more, from amongst our membership, we are more than prepared to convene a task force to help provide such feedback directly, if you agree that this would be useful.

While we fully acknowledged that such attempts by your office and the consultant, have been made; nevertheless, we feel strongly that there is still room, in our view, for further dialogue. Based on this, the Chamber would like to reserve comment to allow on preferred alternatives, to provide our Transportation Committee to pro-actively work with the City to help obtain additional meaningful input and support.

If you have any questions on any of this and/or would like to take advantage of our offer, please contact our CEO, John Dolbec 2 (905-522-1151 ext. #229) or j.dolbec@hamiltonchamber.on.ca.

Yours Respectfully,

Ruth Liebersbach, President,
Hamilton Chamber of Commerce

cc: All Directors, including Chairs of our Ancaster, Dundas and Glanbrook Divisions

Daniel Rodrigues Chair, as well as all members of the Chamber's Transportation Committee, which includes representation from the MITL.

John Best, Southern Ontario Gateway Council.

Ontario Trucking Association

My concerns on Alternative 3 (the preferred option) are as follows:

- Contained within the rationale to remove certain existing Truck Route streets, IBI or staff conducted 'counts', however they failed to do so in a consistent manner. For some streets, they show a "7-hour" count, while others show a "24-hour" count.
 - To accurately demonstrate the impact of removing a Truck route street, a full 24-hour count for all streets should have been completed.
- Absolutely no research was completed to identify the reason or origins of the trucks which used the streets designated as a Truck Route. This is particularly important when roads currently on the Truck Routing grid are being removed through this proposal.
 - An example of this would be Nash Rd. Their counts show a high number of trucks using this road, yet they have chosen to remove the road in the preferred option, surmising that these trucks will now move to either the Red Hill Valley Parkway or Centennial Parkway.
- Within their "Evaluation Methodology" used to create Alternative 3, they show part of the process to determine a Truck Route street was to "Identify planned changes to road network". However, upon further questioning they had indicated that they did not review the current Ancaster Traffic Study when the recommendation to remove Jerseyville Road from the Truck Route grid in favour of those trucks moving to Wilson Street.
 - While this particular example showed minimal impact of truck counts on Jerseyville Road, the numbers supplied were only taken in a 7-hour window.
- Another example of omission of their own "Evaluation Methodology", is linkages and connectivity. The preferred alternative recommends the removal of Kenilworth Avenue from the Truck Route grid. This traffic will be moved to Ottawa Street.
 - To carry this further, as a result of removing Kenilworth Avenue, this means that so too is Kenilworth Access no longer on the Truck Route grid. However, Upper Ottawa (the closest connecting street to the Kenilworth Access) continues to be designated as a Truck Route, but only to Fennell Avenue.
 - A sample scenario of this proposed plan would mean that a truck which completes deliveries on the east mountain would need to go to the Lincoln Alexander Parkway and proceed down the Red Hill Valley Parkway and exit accordingly.
- Considering the breadth and data used to reach a preferred alternative, there are glaring omissions in their supporting documentation. These include:

- When identifying the impact of truck counts on roads adjacent to proposed roads to be removed from the Truck Route, the total impact numbers are inconsistent or absent. (i.e.-if road 'y' currently handles 'x' trucks, the impact of removing road 'w' from the Truck Route will impact road 'y' by an additional 'z' amount. Currently, only the 'z' amount is provided, which misrepresents the total impact.)
- In a single example, northbound truck count on Dundurn Street was not identified as to which roads these trucks will now use.
- The preferred plan also calls for the removal of Barton Street, from Ottawa to Queen Streets.
 - While this certainly needs consideration within the Barton Village BIA area due to street design, there appears to be no consideration to how the industrial area will be serviced in a sound and efficient manner.
- There are clear proposed changes made to the Truck Route grid based solely on individual Councilor requests and not for the betterment of flow of goods.