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VIA EMAIL pgmc@toronto.ca

Tuesday November 14, 2017

City of Toronto
Planning and Growth Management Committee
10th Floor, West Tower, City Hall,
100 Queen St. W.
Toronto, ON
M5H 2N2

Attention: Nancy Martins, Secretariat

Dear Ms. Martins

Re: **Comments on the Port Lands Planning Initiatives (PG24.6)**
Draft Official Plan Amendment, Port Lands and Villiers Island Precinct Plan

The Toronto Port Authority (operating as PortsToronto) (“PortsToronto”) thanks you for this additional opportunity to comment on the draft Official Plan Amendment for the Port Lands and this opportunity to comment on the Villiers Island Precinct Plan.

DRAFT OFFICIAL PLAN AMENDMENT, PORT LANDS

As you know, the Toronto Port Authority provided comments on a previous draft of the Official Plan Amendment for the Port Lands by way of letter dated April 12, 2017 (the “April Comment Letter”). A copy of the April Comment Letter is attached as Schedule “A” to this letter for your reference.

We note that the current draft of the Official Plan Amendment for the Port Lands (the “OPA”) addresses, in part, certain of the comments in the April Comment Letter.

We would like to take this opportunity provide comments on the OPA which are in addition to, and not in substitution for, the comments contained in the April Comment Letter. Comments made in the April Comment Letter which have not been implemented in their entirety in the OPA are incorporated by reference into this letter.

We note that Section 1 of the OPA continues to provide that the OPA is to be read in conjunction with the Port Lands Planning Framework dated September 2017 (the “Framework”). We reiterate our comment from the April Comment Letter that all parts of the Framework that are relevant to the OPA be adopted into the OPA. Failing this, our comments contained in this letter and our comments contained in the April Comment Letter are intended by PortsToronto to also be, and should be considered by the City as being, comments on the Framework.

COMMENTS ON DRAFT OFFICIAL PLAN AMENDMENT, PORT LANDS

As set out in the April Comment Letter, PortsToronto does have comments, concerns and suggestions regarding the OPA, especially as it relates to its impact on the Port of Toronto and the

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continued movement of passengers, goods and cargo to and from the Port of Toronto. Our comments relate to the following themes:

1. The OPA should ensure appropriate and functional rail access to and from the Port of Toronto;
2. The OPA should ensure appropriate and functional marine access to and from the Port of Toronto;
3. The OPA should ensure appropriate and functional truck access to and from the Port of Toronto;
4. The OPA should ensure that the active port function be allowed to evolve and expand; and
5. The OPA should explicitly provide that future planning decisions should identify and consider the requirements of users of the Port of Toronto and of PortsToronto.

The comments set out below and in our April Comment Letter are an attempt to suggest methods for implementing these objectives, but should not be read as the only way by which these objectives can be reached. Alternative policy additions, subtractions or amendments may provide viable means of implementing these themes, which are the overriding pieces necessary to maintain an active and healthy port in the Port Lands.

Notwithstanding the fact that PortsToronto and Toronto Port Lands Company have entered into agreements concerning the maintenance and repair of the only rail line servicing the Port of Toronto, we believe that it is vitally important for the OPA to specifically identify and address issues relating to rail access to the Port of Toronto. The OPA is a statement of the City's policy that will guide decisions and growth relating to the Port Lands and transcends any particular contractual relationship.

In addition to, and not in substitution for, our general and specific comments contained in the April Comment Letter and our general comments set out above, PortsToronto offers the following specific comments on the OPA:

Section 2.1.3(c) – This section should acknowledge the important role that the Ship Channel and Turning Basin play in the functioning of the Port of Toronto. The first three sentences of this section should be amended to read as follows: *“The Ship Channel and Turning Basin are unique waterfront transportation spines for marine cargo. They are powerful focal points around which new communities and areas of employment will be built. The needs of port users requiring marine access along the Ship Channel and in the Turning Basin and dockwall space will be protected and enhanced while considering if there are opportunities to capitalize on the Ship Channel and Turning Basin as public recreational amenities.”* The remainder of this section should be deleted.

Section 2.1.6 – This section recognizes the importance of the Port but it does not recognize that marine, rail and truck access to the Port are vital to the continued operation of the Port. The second section of this section should be amended to read as follows: *“The active port, together with marine, rail and truck access to the port, will be allowed to evolve and expand, and new, diverse communities and employment clusters created.”*

Section 4.1 – We note that this section has been moved in this draft of the OPA and was previously contained at Section 4.4.1 of the prior draft of the OPA. Please see our comment on Section 4.4.1 contained in the April Comment Letter.

Section 4.2.6 b) – The words “and that proposed uses would not impact the quality of life of residents in proposed neighbourhoods” should be reconsidered and the underlying intent fleshed out. It is our position that it is new residential uses that must demonstrate that they will not unduly impact the operations of Port and industrial users who benefit from access to the Port.

Section 4.2.6 c) – This policy should be clarified that Industrial users are permitted where such uses are users of the Port.

Section 4.2.9 – This section should be deleted in its entirety. The policy should clarify that the PortsToronto Marine Terminal property can be used for any use permitted in accordance with PortsToronto’s letters patent.

Section 4.3.4 – The proposed definition of Port land uses is too restrictive. PortsToronto’s letters patent provide a more complete description of the types of uses that should be included within the Port designation.

Section 4.6 – This section needs to take into account not only existing uses, but, as we noted earlier, the evolution of the port functions in the Port Lands. Proposed sensitive land uses must demonstrate that they will not impact or be impacted by the Port.

Section 4.6.5 – This section needs to recognize that port uses and operations, not just industrial, must be taken into account in assessing land use compatibility issues in order to ensure that Port operations are not adversely impacted. This section should read as follows: *“The City will consult with the Toronto Port Authority, industrial operators and Port users during the development approval process for any sensitive uses to ensure compatibility between development proposals and industrial and Port operations.”*

Section 5.3.6 – To ensure that rail access along the only rail spur serving the Port of Toronto is protected and preserved the second last sentence should have the following words added at the end: *“in a manner that ensures no adverse impact on rail operations.”*

Section 5.5 – It should be made clear that Port uses will be constructed on or near the dockwall.

Section 15.12 – The use of holding provisions should be limited to those uses not already permitted. In addition, vibration studies should be added to 15.12 d) given the rail and shipping operations that take place within the Port Lands and all studies within 15.12 d) should be required to take into account the reasonable evolution of the Port and port uses and related facilities.

VILLIERS ISLAND PRECINCT PLAN

Villiers Island will be the home of “New” Cherry Street which will become the major road artery into the Port of Toronto. Accordingly, the comments made in the April Comment Letter and this letter regarding access to the Port of Toronto and future planning decisions considering the requirements of PortsToronto and port users also apply to the Villiers Island Precinct Plan.

ROADS AND TRANSPORTATION NETWORK

Attached as Schedule “B”, please find our correspondence dated November 4, 2017 relating to the Port Lands and South of Eastern Transportation and Servicing Master Plan Environmental Assessment process. The comments set out in that letter as it relates to transportation issues are also relevant to the proposed OPA. We incorporate those comments, mutatis mutandis, to the OPA.

CONCLUSION

Once again, we thank you for the opportunity to review and provide these further comments on the OPA, the Villiers Island Precinct Plan and the Framework. We would like an opportunity to meet with the City to provide context to these comments and we look forward to such a meeting occurring quickly.

The specific comments in this letter are in addition to the general comments set out in this letter and the comments contained in the April Comment Letter. Where certain sections of the OPA, the

Villiers Island Precinct Plan and/or the Framework should be amended in order to implement the general comments contained in this letter and in the April Comment Letter and were not caught by the specific comments in this letter and the April Comment Letter, our comments are intended to apply across each of the OPA, the Villiers Island Precinct Plan and the Framework.

Yours very truly,

TORONTO PORT AUTHORITY

Per: 

Christopher Sawicki, P. Eng.

Vice President, Infrastructure, Planning and Environment

CC: Geoffrey Wilson, CEO PortsToronto

Schedule "A"
April Comment Letter
(see attached)

Schedule "B"
November 4, 2017 EA Comment Letter
(see attached)

By Mail & Email:

April 12, 2017

City of Toronto
City Planning Division
100 Queen St. W
Toronto, Ontario
M5H 2N2

Attention: Cassidy Ritz; Project Manager, Strategic Initiatives

Dear Ms. Ritz

Re: Comments on Draft Official Plan Amendment, Port Lands

Toronto Port Authority thank you for the opportunity to comment on the Draft Official Plan Amendment for the Port Lands. As you know the Toronto Port Authority (operating as PortsToronto) is a federal government business enterprise governed by the Canada Marine Act and Letters Patent issued by the federal Minister of Transport, which works to ensure that Toronto's Harbour is safe for boaters and visitors and to protect the environment in the Harbour. In addition, PortsToronto is the owner and operator of the Outer Harbour Marina, Billy Bishop Toronto City Airport and the Port of Toronto. We are writing to provide the City with our preliminary comments with respect to the draft Port Lands Official Plan Amendment (the "OPA"). We have framed our comments on policy areas that are of interest to our governance requirements under Transport Canada.

General Comments on the Draft Official Plan Amendment

PortsToronto appreciates the fact that the OPA acknowledges the importance of the Port of Toronto (the "Port") as a vital element of infrastructure that is a key driver of the economic growth of Toronto.

In fact, in 2016, more than 1.8 million tonnes of cargo arrived at the Port of Toronto. This cargo arrived via 157 ships bringing sugar, road salt, cement and aggregate, including stone and sand, directly into the heart of Toronto.

From a sustainability perspective, the cargo delivered by ship in 2016 took approximately 45,000 (40-tonne) trucks off the road system in Toronto. In addition to receiving cargo in 2016, the Port of Toronto hosted seven passenger cruise ships carrying more than 2,400 passengers who visited the City through the Cruise Ship Terminal located in the Port Lands.

While the OPA recognizes the importance of the Port, PortsToronto does have comments, concerns and suggestions regarding the OPA's impact on the Port and the continued movement of passengers, goods and cargo to and from the Port. Our comments on the OPA focus on the following themes:

1. ***Essential Rail Access to the Port of Toronto*** – The OPA does not clearly acknowledge the need to maintain reliable and modern rail access to the Port. We note a number of adverse impacts to the current rail spur notably with the proposed re-alignment of Broadview Ave. across the Keating Sorting Yard near the Gardner Expressway, east of the Don River; and, the contemplated 50 metre wide Leslie Green Portal on the west side of Leslie Street. Additionally, the OPA and the related presentation made by City staff on March 29, 2017 suggest a re-alignment of the eastern section of Unwin Ave. that is in conflict with the current rail line serving the Port. We request a meeting with the City of Toronto and Waterfront Toronto to discuss and consult on preserving and protecting rail access to the Port of Toronto. .

2. ***Essential Marine Access to the Port of Toronto*** - PortsToronto supports the concept of providing increased access to the public along the water's edge. However, we believe in practical terms, access along the south dock wall of the Ship Channel will be problematic from a public safety and security point of view and will significantly adversely impact marine access to the Port. The South Port district in the OPA is zoned as "Port" and "Port Industrial" allowing vessels to berth along the south dock wall of the Ship Channel. The OPA contemplates a public promenade along the south dock wall of the Ship Channel which will be no less than 18 metres wide with landscaping, seating and multi-use pathways. The mix of loading and unloading of vessels and the public promenade will be in direct conflict. The proposed extension of Broadview Avenue and the proposed extension of the Don Roadway across the Ship Channel will further adversely impact marine access to the Port. Similarly, the recreational water access and marine transit node contemplated in the Ship Channel Turning Basin will further adversely impact marine access to the Port. We request a meeting with the City of Toronto and Waterfront Toronto to discuss and consult on preserving and protecting marine access to the Port of Toronto.

3. ***Essential Commercial Truck Access to the Port of Toronto*** - While the OPA does identify the need for specific routing of truck traffic in the Port Lands, PortsToronto believes that a holistic study should be conducted to understand the routing for truck traffic to and from PortsToronto's property and the South Port, South East Port and East Port Districts. The study should include an analysis of how these trucks not only enter, leave and make their way through the Port Lands area but also how they access the broader road network immediately adjacent to the Port Lands. We request a meeting with the City of Toronto and Waterfront Toronto to discuss and consult on preserving and protecting truck access to the Port of Toronto.

4. ***OPA to Specifically Acknowledge Input of PortsToronto and Port Users*** - In order to ensure that future planning decisions identify and consider the requirements of Port users, the OPA should clearly state that the requirements of PortsToronto and Port users should be taken into consideration, and both PortsToronto and Port users should be consulted in connection with future planning decisions. As an example, there are a number of instances in the OPA where the interests of specific groups (e.g. industrial operators) are considered as factors to be evaluated in connection with future planning decisions. This should be extended to PortsToronto and Port users.

Pursuant to federal legislation, PortsToronto is obligated to ensure regulations apply in respect of the navigable waters of a port, works and activities in a port.

5. **Port of Toronto Existing Use Designation** – PortsToronto generally agrees with the City's proposal to continue to recognize the Port of Toronto site as an Existing Use Area. We would ask, however, that the OPA make it clear that the Port of Toronto Existing Use Area is not limited in scope and nature with any particular use on the property as of today, but that the site be able to continue to evolve, both with the expansion of existing uses and with the introduction of new uses consistent with the mandate and letters patent of PortsToronto.

Specific Comments on the draft Official Plan Amendment

In addition to and building upon our general comments set out above, PortsToronto offers the following specific comments on the OPA:

Section 1 – We appreciate the time and effort that has gone into creating the Port Lands Planning Framework. However, we would respectfully suggest that all parts of the Framework that are relevant to the OPA be adopted into the OPA.

Section 2.1.2(c) - This section highlights the extension of Broadview Ave. through the Port Lands across the Ship Channel. The recommended alignment of Broadview Ave. will intersect directly through the Keating Sorting Yard. This yard is vital to Port operations. The operations and business viability of the Port is severely constrained without the Keating Sorting Yard. As such, PortsToronto requests that the alignment of Broadview Ave. in this area be re-considered.

Section 2.1.3(c) – This provision recognizes, in part, the importance of the existing port uses but does not clearly protect the same and their right to expand. Given the importance of the Port Lands as the Port, we request that the words "balanced with the opportunity" be removed from this section and replaced with "protected and enhanced, while considering if there are opportunities..."

Section 2.1.3 (d) -This section outlines the future alignment of Unwin Ave. The section indicates "... stormwater infrastructure that hugs the treed edge and integrates existing rail lines, while accommodating continued truck traffic...." PortsToronto seeks greater clarity on how the road re-alignment, specifically in the vicinity of the Hearn and Port Lands Energy Centre, will not adversely impact the rail line and how the rail line will continue to exist to provide access to the Port for modern rail cars.

Section 2.1.4 -This section describes an ambitious park network throughout the Port Lands that takes advantage of both land and water access. It is our understanding that some type of recreational water access is planned for the Ship Channel Turning Basin. PortsToronto wishes to understand the functionality of such a use as the Turning Basin is an active marine facility, which supports the operation of the Port. We believe the two functionalities are in conflict. PortsToronto also understands some form of marine transit node is planned at the Ship Channel Turning Basin. This too will impact marine operations within the Ship Channel. Pursuant to federal legislation, PortsToronto is obligated to ensure regulations apply in respect of the navigable waters of a port, works and activities in a port.

Section 3.3 - PortsToronto suggests adding the following to this section: "Ensure the continued operation of a viable and vibrant Port of Toronto, including appropriate functional marine, rail and truck connection into and out of the Port."

Section 3.12 – This provision should be clarified to make it clear that port users will not be relocated. In addition, it is not clear to us what the term "future proof portions of the Port Lands" means.

Section 4.1.2 c) – This section provides that residential and other sensitive uses will only be considered in the Polson Quay district if, among other things, "there will be no undue negative impacts on the Cement Terminal located in Polson Quay or other continued industrial operations within the vicinity of the districts". The word "industrial" should be expanded to "industrial or port" to recognize that impacts on the operation of the Port (located directly across the Ship Channel from Polson Quay) should also be considered when residential and other sensitive uses are being considered in the Polson Quay district.

Section 4.1.2 d) – For the same reasons outlined in our comment on Section 4.1.2 c), the reference to "industrial operators" in Section 4.1.2 d) should be expanded to include "industrial operators and Port users".

Section 4.1.8 – The Maritime Hub uses should specifically be made subject to the requirement to demonstrate that the proposed uses will have no impact on the Port, that such uses are compatible with the Port and its use, and potential future uses.

Section 4.2.4 – Please add the phrase ", bulk or otherwise," after "storage".

Section 4.2.5a) – The words "desired and" should be removed at the start of this section. It creates an unnecessary distinction between the two types of industrial uses in sections 4.2.5 a) and 4.2.5 b).

Section 4.4.1 – This section should be amended in order to make it clear that Port uses are not to be re-located without the approval of the Toronto Port Authority.

Sections 4.4.2 to 4.4.5 – These Sections all need to recognize that existing port uses and operations must be taken into account in assessing land use compatibility issues in order to ensure that Port operations are not adversely impacted. Specific examples include:

- **Section 4.4.2** – The first sentence of this Section should read as follows: "Land-use compatibility issues between industrial uses anticipated to remain and Port uses".
- **Section 4.4.3** – The second sentence of this Section should read as follows: "Such environmental reports are to specify how compatibility will be achieved and maintained between existing industrial operators and Port users....".
- **Section 4.4.4** – The first sentence of this Section should read as follows: " Sensitive land uses in proximity to continued industrial operations and Port operations....".
- **Section 4.4.5** – This Section should read as follows: "The City will consult with the Toronto Port Authority, industrial operators and Port users during the development approval process for any sensitive uses to ensure compatibility between development proposals and industrial and Port operations."

Section 5.2.6 – The contemplated 50 metre wide Leslie Green Portal on the west side of Leslie Street will include the lands upon which the only rail spur serving the Port of Toronto is located. The proposed uses for the Leslie Green Portal do not include the rail spur. Rail access to the Port is integral to the proper functioning of the Port.

Section 5.3 - This section describes a continuous Public Promenade along the Ship Channel. PortsToronto supports the concept of increased public access to the waterfront however, we believe this may be

problematic along the south dock wall of the Ship Channel. The lands adjacent to this dock wall, the South Port district, are used for Port and Port Industrial purposes. Vessel berthing along this dock wall will be a permitted activity for the loading and unloading of bulk goods. Public access in this area and vessel operations will be in direct conflict with one another. This conflict will have the potential to create safety International Ship and Port Facility Security issues and will adversely and significantly impact marine access to the Port.

Section 5.4 – This section relates to the potential Future Water's Edge Promenades. As noted in the section, these properties will continue to have Port uses for the foreseeable future. During this period, it is inappropriate to insert artificial restrictions on the properties that could significantly impact these uses in anticipation of the fact that, once these uses end, there could be a public promenade on the site. The promenade space can be secured at the appropriate time should the promenade ever expand to a given site. As such, the 18m restriction should be removed.

Section 9. - Transportation - The Transportation Section in the OPA is incomplete in that it has not identified the existing and proposed future transportation opportunities, and in turn the City's Transportation Master Plan going to City Council in July 2017 which, is also not complete. Components that are missing from the OPA and Master Plan include marine and rail transportation and how these connect and support the road/truck operations. The OPA makes no reference to the existing marine transportation system, the existing rail transportation system and the proposed future ferry operations and how they will connect, deliver goods, service existing and future customers including industry, port users and development in the Port Lands.

Section - 9.1.2 *"Lane widths will be minimized in consideration of the role and function of an individual street to assist in making streets safer and more pedestrian friendly;"* PortsToronto support the desire for safe and pedestrian friendly streets and only caution that in designated truck routes, sufficient lane widths and turning radii be considered for these vehicles.

Section - 9.4 *"A potential future extension of the Dan Roadway across the Ship Channel to Unwin Avenue will be protected for."* PortsToronto appreciate the planning of further connectivity of traffic to the South Port district. The inclusion of this extension would require a lift bridge crossing the Ship Channel. During vessel operation within the Ship Channel, all three bridges would in effect need to open simultaneously in order to allow for the safe passage of a vessel. The net effect will be traffic congestion within the districts immediately north of the Ship Channel (South River, Media City, and Turning Basin districts).

Section 9.13.1 – The Toronto Port Authority and Port users should be consulted in connection with future decisions regarding the movement of goods and truck routes in the Port Lands. Reliable truck routes with sufficient lane widths and turning radii are essential for the proper functioning of the Port. The second sentence of this Section should read as follows: "Dedicated truck routes that enables convenient and reliable routes for the movement of goods in and through the area will be advanced in consultation with the Toronto Port Authority, industrial operators and Port users". Also, please note that the first use of the term "port and industrial uses" is done outside of the pre-existing defined terms.

Section 10.3 d) – The requirements set out in this provision have the risk of driving up costs of port users and making the Port area uncompetitive and risks pushing away port users. As such, the proposed restrictions on storage should be removed.

Section 15.10 c) – An analysis of a development's compatibility with, and adverse impacts on, Port uses is an important consideration to ensure that the viability is maintained. This Section should be amended to specifically identify Port uses.

Port Lands Planning Framework

At the joint Stakeholder Advisory Committee and Landowner and User Advisory Committee meeting of March 27, 2017, the City of Toronto advised that the Port Lands Planning Framework will define what is to be achieved and measure success. Planning Department staff advised that every 10 – 15 years there will be an Official Plan review undertaken and this would be the opportunity for anyone (public, stakeholders and land owners) to provide input and measure success. Based on this 50+ year plan for the Port Lands, PortsToronto would suggest that success of this multi-year/multi-decade plan might better be measured based on a plan with expected/planned outcomes or phases to be developed. We believe it would be appropriate to engage yearly with key stakeholders and landowners so that problems can be identified, resolved and implemented to reduce operational issues each year, versus a 10 year horizon. A program that can measure, track and easily inform any needed Official Plan amendments or Official Plan policies should be developed and implemented, which could provide an avenue for buy-in with stakeholders as a flexible tool to implement the larger plan.

Conclusion

Once again, we thank you for the opportunity to review and provide these comments on the Draft Official Plan Amendment for the Port Lands. Our comments are preliminary in nature and through dialogue with the City; we would like the opportunity to provide additional comments in the near future.

The above specific comments are in addition to the general comments set out in this letter – where certain sections of the OPA should be amended in order to implement the general comments in this letter and were not caught by the specific comments above, our comments are intended to apply across the OPA.

We respectfully suggest that, going forward, it would be helpful to all parties if PortsToronto were more regularly involved in the City's and Waterfront Toronto's consultations as it relates to the Port Lands and would like to offer to meet with your teams to go over our comments and concerns in more detail.

Given PortsToronto's essential role in the operation of the Port we would be pleased to work with the City in helping to guide this Official Plan Amendment in a way that takes all stakeholders into consideration.

Should you have any questions, please do not hesitate to contact us.

Yours very truly,

Toronto Port Authority
per:



Christopher Sawicki, P.Eng.
Vice President, Infrastructure, Planning and Environment

cc: Mr. Geoffrey Wilson, Chief Executive Officer; PortsToronto

By Mail & Email:

November 4, 2017

Cassidy Ritz
Project Manager
City of Toronto
Metro Hall, 22nd Floor, 55 John Street
Toronto, ON M5V 3C6

cassidy.ritz@toronto.ca

Attention: Ms. Cassidy Ritz, Project Manager

Dear Ms. Ritz:

Re: Port Lands and South of Eastern Transportation and Servicing Master Plan Environmental Assessment

The Toronto Port Authority (carrying on business as "PortsToronto") would like to thank you for the opportunity to provide comments on the Port Lands and South of Eastern Transportation and Servicing Master Plan Environmental Assessment. We are writing to provide our comments with respect to concerns and gaps we identify in the areas of transportation connectivity and sustainability opportunities, and some clarity on other items in the report for updating purposes.

Toronto's Only Port

At East York Community Council, senior city staff referenced the Port of Toronto as a key asset and important to the City's economy. As the City's only working Port, operating since 1793, the Port of Toronto has served as Toronto's gateway for cargo received from markets around the world. Today, the Port's location in Toronto's downtown core allows millions of tonnes of goods from countries as far away as Brazil, Japan, Turkey, Korea and the United States to provide easy access into the City of Toronto. Replicating the Port, as well as the jobs and economic benefits associated with it, is all but impossible. To ensure this gateway to the world continues into the future, planning policies, guidelines and frameworks must identify, include and consider associated opportunities.

Transportation Planning Must be Comprehensive and Thorough

The existing transportation network in the Study Area is underserved and poorly connected, which has resulted in underutilization of the system of current users for many years. The vision

and planning for the future development of the Port and the Port Lands, must include rail, truck and marine connectivity, which should be integrated in with transit, pedestrian and cycling

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networks in the current or future transportation network. The proposed Environmental Assessment fails to integrate all forms of transportation. This is a lost opportunity and has similarly resulted in key components missing in the Central Waterfront Secondary Plan and the South of Eastern Transportation Official Plan Amendment.

We understand a work program will look to initiate a zoning review for the Port and Industrial Districts, which will include an overall Port Lands truck management strategy, as reported at East York Community Council on October 12, 2017. PortsToronto also requests that as part of that same work program, the City include a review of the gaps that exist in the planning framework related to rail and marine management strategy and connectivity to goods and services movement, as well as people movement to the Toronto Islands and the Central Waterfront.

As part of this work program, concerns with truck access and dock access, as well as placing residential/sensitive land use development adjacent to their industrial land uses should be considered. Similar to other port industrial stakeholders, PortsToronto has concerns that truck, rail and marine routes are not being analyzed or considered to the same degree as transit, pedestrian and cycling routes. PortsToronto would like to be included as a landowner and stakeholder in this planning work, and request to be consulted and engaged early in the process for this work.

Rail a Critical Component to a Functional Port

With regards to essential rail access to the Port of Toronto, the Master Plan does not clearly acknowledge the need to maintain reliable and modern rail access to and from the Port, and without this the Port cannot operate within the transportation network to supply goods. We identified the same issues with regards to the Draft OPA for the Port Lands, in a letter dated April 12, 2017. In this letter we noted a number of adverse impacts to the current rail spur notably with the proposed re-alignment of Broadview Ave., east of the Don River and the contemplated 50 metre wide Leslie Green Portal on the west side of Leslie Street. The existing rail line servicing the Port of Toronto is a fundamental component of PortsToronto's ability to move cargo in and out of the Port and to fulfil its federal mandate as a Port Authority. Without reliable and modern rail access the Port would be unable to function properly, which would, in turn, put the Port, and the jobs and other economic benefits associated with it at risk. As such, appropriate and functional rail access is a necessary and critical transportation issue that must be considered and protected while developing a comprehensive planning and transportation framework for the area.

The Master Plan identifies that goods movement in the Study Area is provided by two modes: heavy rail and truck. Further, the Master Plan states that in the future, heavy rail activity in the Study Area will be limited to very specific industrial activity at the Port Lands and at infrequent times. We would like to understand if the City has undertaken any studies that support this statement. Rail activity in the Port Lands will depend on the ongoing evolution and development of the Port, its users, as well as in the global transportation of goods.

Rail activity is to be accommodated in the future by the existing spur line connections along Unwin Avenue, Leslie Street and Lakeshore Boulevard East to the Keating rail lines. We understand that City staff will be undertaking planning reviews into the future which would consider relocation or consolidation of railyards in the area as an option going forward. As noted previously, we

suggest that it would be best to deal with all transportation issues at once. We also request to be brought into the process at a pre-consultation stage, if there is any consideration where the rail

lines, rail yards and connections through the street rights-of-way where existing and future heavy rail corridors are affected or potentially affected. The Master Transportation Plan must ensure the rail lines and rail yards are protected for current and future use, which may need to include accommodation for a modernized rail system with larger cars.

Water Transportation for Goods Critical for Sustainability

From a sustainability framework perspective, there is an opportunity that is not being explored in the area of sustainable transportation by water. As a point of reference, commodities brought into the port by ship include aggregate and cement for construction, salt for winter road and highway maintenance and sugar. Shipping cargo through the Port of Toronto takes an average of 40,000 40-tonne trucks off the road system through Toronto each year. One tonne of freight can travel 240 km by ship on a single litre of fuel. The same amount of cargo can only travel 100 km by train and less than 30 km by truck on the same amount of fuel. By not undertaking a work program that looks at transit, pedestrian, cycling, truck, rail and marine traffic route movement collectively, the sustainability framework is not inclusive of current and future guidelines and policies towards carbon reductions.

Goods Movement Must be Considered

The Master Plan's preference for transit, pedestrian and cycling transportation solutions within the Port and Industrial use areas cause the truck, rail and marine traffic route and movements to become secondary. This will result in this key Port infrastructure to continue to be underserved. It is key that in this part of the Study Area, that goods movement needs to be protected, planned for the future, connected with all transportation modes and be identified as an opportunity to be innovative and sustainable.

We are not aware that an assessment of the potential impacts to the Port of Toronto and as a result, the viability of the Port itself, has been undertaken in advance of the Master Plan findings. As such, it is difficult to assess the potential impacts. Existing and future new connections by land or by water should be studied as it will assist with the planning to identify alternative routing during ongoing maintenance and/or reconstruction of area infrastructure.

PortsToronto advises that the following considerations with respect to the operations of the Port of Toronto need to be incorporated into transit planning:

- Overall design of the transportation network in the Study Area needs to accommodate truck movement and access through the street network for access to the Port of Toronto and the Port and Industrial area, which will need to ensure continued access today and into the future;
- designs of the street at Unwin and Cherry Streets will need to ensure continued truck, vehicle and bus movements in and out of PortsToronto's Marine Terminal property at 8 Unwin Street and the broader Port of Toronto; and
- considerations to accommodate current and future turning movements in the Port Lands based on larger truck movements in and out of PortsToronto's Marine Terminal property at 8 Unwin Street and the broader Port of Toronto.

Technical Clarifications of the EA

We would like to provide some clarity for inclusion in the environmental assessment as it relates to land ownership. The report references that the Government of Canada owns 25 hectares which is identified in the land ownership map as Toronto Port Authority/PortsToronto property. In fact, the property at 8 Unwin Avenue is owned by PortsToronto and not the Government of Canada. The text in the page prior to the map should also be corrected.

As well, on page 127 of the Master Plan, there is reference that the Ship Channel lift bridge has only 1 lane operating to service both north and south bound traffic. Enhancements have and will be made ensure 2 way to the bridge by the City and PortsToronto, which include 2 lane operations to service both north and south bound traffic.

As transit planning directly impacts PortsToronto's ability to fulfil its federal mandate, we would like to meet with City of Toronto staff as soon as possible to discuss these concerns and how best to ensure they are incorporated into the overall Servicing and Transportation Master Plan for the Port Lands and South of Eastern Study Area.

Should you have any questions, please do not hesitate to contact myself or Angela Homewood at AHomewood@portstoronto.com.

Yours very truly,

Toronto Port Authority
per:



Christopher Sawicki, P.Eng.
Vice President, Infrastructure, Planning and Environment