

# IE16.1.3



October 5, 2020

10th floor, West Tower, City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2  
Attention: Matthew Green

## **RE: IE16.1 Toronto Freight & Goods Movement Strategy**

Dear Chair Councillor James Pasternak, and Members, Infrastructure and Environment Committee,

FoNTRA represents over 30 residents associations generally within the area bounded by Bloor, Bathurst, Sheppard and the DVP.

The Freight & Goods Movement Strategy focused on solutions and recommendations leading to an action plan covering four thematic areas:

- Planning and Infrastructure
- Street Design and Management
- External Economic Impacts
- Innovation

The report proposes twenty-four (24) strategic actions, which are broken into short, medium and long term.

Overall, the report is comprehensive in its development of a freight and goods movement strategy; however with this singular focus there are risks to other considerations, such as impacts on different land uses, noise, safety, and other users of the space required for goods movement. Given the apparent lack of input from civil society stakeholder representatives such as Residents Associations, Walk Toronto, the Toronto Noise Coalition, Friends and Families for Safe Streets, etc. this is unsurprising.

The Official Plan states that:

*“The integration of transportation and land use planning is critical to achieving the overall aim of increasing accessibility throughout the City. Accessibility has two components: mobility (transportation) and proximity (land use). Increasing mobility by providing modal choice, and/or increasing the speed of travel allows more trips to be made within a given time, whereas increasing proximity through greater mixing of uses and/or higher densities achieves the same effect by shortening trip lengths. The policies of this Plan reflect the importance of mutually supportive transportation and land use policies that combine the mechanisms of mobility and proximity to maximize accessibility.”<sup>1</sup>*

An integrated approach to a Freight and Goods Movement Strategy would develop typologies that recognize the distance characteristics of transportation, and density characteristics of land use i.e., residential vs. commercial vs. institutional vs. industrial and national/continental/rural, regional/ex-urban and local/urban. This frame of analysis lends itself to understanding the substantive and increasing mobility differences between large scale and long distance (inter-urban) freight and goods movement, and small scale and short distance movement (intra-urban). And at the same time being responsive to the potential of technology to develop innovative new delivery solutions. Attention to land use is critical to meeting the goal of the Official Plan to increase the quality of life for all of Toronto.

Further, below are some issues that arise with respect to:

A. Commercial (retail) deliveries on both main streets and other adjacent streets:

- 1) Diverting deliveries to night-time deliveries (after 8 pm) requires addressing the noise issue – which is possible through (a) use of electric vehicles. (If European countries can do this, we can too) and (b) noise limiting (enclosed) delivery arrangements and restricting hours of operation for different types of deliveries.
- 2) Providing for off-street short-term parking restricted to deliveries in all new developments (either internal or as additional lane in public realm space). Note that the latter would require additional public realm sidewalk setbacks.
- 3) Ensuring much higher fines (and stricter enforcement) of on-street parking during rush-hour and other peak traffic periods. Note the need for CCTV scanning of street to provide for effective enforcement. Also note the need for expanded definition of rush-hour to accommodate increases in near-rush-hour traffic.

B. Industrial deliveries:

The issues with industrial deliveries are different from commercial deliveries. The report proposes some ideas that are worthy of investigating, such as regional drop yards.

C. Residential deliveries

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<sup>1</sup> Toronto Official Plan, Section 2.2 “STRUCTURING GROWTH IN THE CITY: INTEGRATING LAND USE AND TRANSPORTATION

These are of increasing importance as on-line shopping grows. As proposed, some ideas such as common pick up places, and common parking spaces in residential areas for such deliveries are candidates to be considered.

Our comments on the 24 strategic actions are attached (attachment 1).

We request:

- **that civil society stakeholder representatives, such as Residents Associations, Walk Toronto, the Toronto Noise Coalition, Friends and Families for Safe Streets, be included as stakeholders in the Freight and Goods Movement Strategy.**

We appreciate the opportunity to review and comment.

Yours truly,

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**The Federation of North Toronto Residents' Associations (FoNTRA)** is a non-profit, volunteer organization comprised of over 30 member organizations. **Its members, all residents' associations, include** at least 170,000 Toronto residents within their boundaries. **The residents' associations** that make up FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal.

## **Attachment 1: Comments on Recommended Strategic Actions Freight and Goods Movement Strategy**

### **Short-term Strategies**

1. Promote Off-Peak Delivery (OPD) through the implementation of a pilot program.
  - Off peak delivery may work for some areas and for some types of deliveries but not all. Limiting excessive noise levels is critical in areas where people live, hospitals etc.
2. Expand parking opportunities for commercial vehicles.
  - Where is this a problem? Expansion must be done on an area by area basis depending on needs. Will it take away needed on-street parking on shopping streets? This issue is also related to permitted hours of use, e.g. Cumberland Street in Yorkville has varied time related rules.
3. Promote the use of technologies that minimize noise impacts of truck operations and related activity.
  - All City activities should be reducing such unnecessary noise impacts.
4. Explore opportunities with Toronto Police Service to enhance commercial vehicle enforcement and inspections to uphold safety standards.
  - Yes, absolutely necessary (good luck!)
5. Develop a city-wide public education program with private sector partners to enhance the understanding of safety issues around freight mobility for both commercial vehicle operators and other road users.
  - What is the objective? Making truck design safer by providing better sight lines etc., not by telling the public to keep clear. Look at the lessons from the Yonge and Erskine cement truck death in 2019.
  - Where is the recommendation asking the federal government to mandate truck side guards?
6. Establish a Strategic Truck Network (STN) which identifies corridors and alternative routes that are priorities for the implementation of freight and goods movement supportive infrastructure improvement.
  - What does this mean? What does it include? How is this funded and implemented? This is not a one size fits all network. How do these networks fit with the current and anticipated needs of our streets?
7. Promote the use of cargo bicycles, including e-assist, to reduce the impact of freight and goods movement.
  - All City activities should be reducing such unnecessary noise impacts.
8. Partner with the Toronto Parking Authority to explore and pilot the use of delivery vans as mobile pick-up and drop-off locations in repurposed parking lots.

- Not as practical effective as a permanent space such as the Post Office. Someone has to be in the vehicle all day. On site delivery to large office and residential buildings should be required.
9. Explore the use of an appointment-based system to facilitate curbside loading and unloading.
    - Appointment for whom? Assume this happens already with the delivery truck and a store. Have rules for the street re times allowed for curbside use.

### **Medium Term Strategies**

10. Develop additional truck street design guidelines for areas, corridors and intersections that reflect the needs of freight vehicles and has consideration for other modes.
  - These need to be part of the City's complete street policies not a separate package. The complete street policies should be expanded to include industrial areas, as safety for cyclists and pedestrians is important there as well. The guidelines should include what kinds of trucks should allowed in what types of areas. Large trucks do not work on local neighbourhood streets.
11. Explore the use of regional drop yards to improve freight distribution operations.
  - Essential. Big trucks do not work in many parts of the City – too dangerous and roads are not appropriate and should not be changed.
12. Update guidelines for loading and unloading areas in new commercial and residential developments to address current freight and goods movement practices.
  - Yes and practices have changed. Lots of small delivery trucks that have nowhere to go except park on the streets.
13. Enhance the communication of road operation condition to freight operators.
  - Why is this not happening now?
14. Explore a permitting system to allow the use of available curb space for the exclusive use of commercial vehicles during mid-day and/or off-peak periods.
  - No. Not where these spaces are in any demand. Why clutter the street when there are other options?
15. Work with public and private sector partners to encourage the adoption of zero- and low-emission freight vehicles to reduce the environmental impacts of freight and goods movement.
  - Important to do. Trucks are major emission offenders.
16. Expand the use of communal parcel lockers at public and private facilities to reduce the burden and impact of last-kilometre deliveries.
  - Good idea. The Post Office already does this.
17. Explore a permitting system to regulate convenient curbside parking for mobile freight vehicles providing mobile pick-up and drop-off.

- How does this differ from #14??
  - No. Not where these spaces are in any demand. Why clutter the street when there are other options?
18. Advance the study, development and deployment of connected and autonomous delivery vehicles and devices to support last-kilometre deliveries.
- How does the City do this? Pilot project with a company that gets them? How can this work in reality? They are coming, so get ready to have different regulations for them. What role will the Province have?
  - No drones, but use commercial bikes. Robots are still a while away.
19. Identify and enhance existing data sources to support continued understanding of freight activity.
- Of course!

### **Long Term Strategies**

20. Identify and implement truck priority measures along the Strategic Truck Network to support the efficient movement of freight.
- There are other objectives for our streets than making them easier to use by trucks, especially large ones. They may work in industrial areas but not on our main streets and in the Downtown. Consideration of truck use must be part of the complete streets policy and adapted for the various types of area in the City.
21. Develop freight specific land use policies to support freight and goods movement and ensure the long-term viability of major goods movement facilities and corridors.
- How does this relate to the Official Plan? Freight is about movement and use of roads. There are different types of freight with different locations and needs.
22. Examine the feasibility of implementing commercial vehicle low-emission zone.
- Yes, what are other municipalities doing, planning? Electric trucks are coming soon.
23. Explore the use of urban consolidation centres to reduce heavy truck movement and enhance opportunity for greater utilization of active transportation modes.
- Yes. We do not want large trucks in our neighbourhoods as they are too dangerous and cause congestion.
24. Update the Freight and Goods Movement Strategy to address emerging trends and issues.
- Of course, and making use of best practices is essential.