

June 3, 2021

Mr. John Elvidge  
City Clerk  
City of Toronto  
100 Queen Street West  
13<sup>th</sup> Floor W.  
Toronto ON M5H 2N2

Dear Mr. Elvidge

**Re: Cycling Network Plan - 2021 Cycling Infrastructure Installation - Second Quarter Update and Missing Link Sidewalk Program - 2021 Local Road Sidewalk Installation ([IE22.11](#))**

Further to the letter sent to Ms. Watkiss on December 4, 2017, regarding the Proposed Adoption of the South Eastern Transportation Official Plan Amendment – Port Lands Planning Initiatives – Final Report (PG24.6), Canada Post is making another submission regarding the adoption of the above-referenced Cycling Network Plan and the impacts on Canada Post operations at the South Central Processing Plant.

While Canada Post actively supports the expansion of cycling networks across Canada, we want to ensure that this expansion does not jeopardize the health and safety of our employees, nor of residents who use the cycling networks, and it is our view that whenever possible, bicycle lanes should not intersect with heavy volumes of truck and vehicle traffic in industrial areas such as our flagship lettermail processing facility in Canada, located at 969 Eastern Avenue.

Very specifically, as it relates to the proposed alteration and extension of Woodfield Road from a dead-end street to a significant traffic link between Eastern Avenue and Lake Shore Blvd, Canada Post respectfully requests that this area not be considered for extension and the addition of a bicycle lane along Woodfield Road between Eastern Avenue and Lake Shore Boulevard.

By way of background, the South Central Processing Plant is the largest and busiest mail processing facility in Canada, with 40% of our country's mail originating from this building. Our processing facility operates 24 hours per day, seven days per week, processing in excess of 14 million pieces of mail daily. On most days, there are approximately 250-300 trucks, tractor trailers and passenger vehicles that move in and out of this location. The safe and efficient flow of traffic is critical to our operations and our ability to fulfill our mandate to serve Canadians under our Federal Act.

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Over the past number of years, representatives of Canada Post have met with City Staff numerous times during the Port Lands and South of Eastern Transportation and Servicing Master Plan (TSMP) process. We have consistently advocated for the health and safety of our workers, as well as those of the community, but recommending that bicycles not be deliberately directed into such heavy volumes of industrial traffic. Additionally, it is our understanding that it is not known what the demand is for a cycling connection from Lakeshore to Eastern and further north. Anecdotally, City Staff have seen bikes using the road however a measurement of current or use of future demand is not immediately apparent. It has also been brought to our attention that this project has not engaged City Staff responsible for the movement of Freight and the Freight Movement Strategy or the other international logistics company on the east side of Woodfield Road (UPS).

As we have highlighted throughout these discussions, directing cyclists and pedestrians directly into an area where Canada Post trucks maneuvering in and out of the South Central Processing Plant has the potential for catastrophic consequences. Additionally, the interruption of our operations while our truck drivers wait for breaks in the traffic could have delivery impacts for the community that we serve, as well as for the country as a whole given the significance of our operations out of the South Central Processing Plant.

We again reiterate that Canada Post supports the safe design of cycling networks but have specific deep concern about the proposed bicycle lane on Woodfield Road.

Another concern that has been raised by Canada Post is that the proposed works could require the relocation of our security fence to accommodate trees, cycle lanes and sidewalks. The relocation of this fence would also have significant operational impacts on our operations and has the potential to prevent many of our large vehicles from accessing the loading docks due to the reduced room for truck turning and backing up. As we have said before, Canada Post welcomes the opportunity to review this with City staff to ensure that the security fence remains in place.

As we have done in the past, Canada Post looks forward to engaging with City staff to ensure that our operations work in harmony with cycling lanes and not impede them. The health and safety consequences of cyclists entering heavy volumes of commercial and industrial traffic around the South Central Processing Plant at 969 Eastern Avenue are of great concern to Canada Post and we want to be an engaged part of the discussion to find a solution that works for all interested parties.

We appreciate having the opportunity to comment on these matters and look forward to the continued constructive dialogue with the City and its staff.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chad Schella".

Chad Schella  
General Manager, Government and Community Affairs



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Monday November 13<sup>th</sup>, 2017

Cassidy Ritz, Senior Planner  
City of Toronto  
100 Queen Street West, 18<sup>th</sup> Floor, East Tower  
Toronto ON M5H 2N2

Dear Ms. Ritz,

Thank you for allowing us the opportunity to provide feedback on the City of Toronto, Port Lands and South of Eastern Transportation and Servicing Master Plan ("TSMP"). We apologize for the delay in our response and appreciate the extension that you have provided to us to comment on the TSMP before it is finalized.

The primary concern of Canada Post with the TSMP is the potential alteration of Woodfield Road from a dead-end street to a significant traffic link between Eastern Avenue and Lake Shore Blvd, and associated revisions (the "Proposal").

Canada Post has recently retained consulting engineers and planners to help us properly understand the implications of the TSMP as well as the proposed Official Plan Amendments. Although we understand that the Proposal has been categorized by the City of Toronto as a Schedule A+ project under the Municipal Class Environmental Assessment ("EA"), it is our opinion and that of our experts that this change could have significant adverse effects on our facility and on Woodfield Avenue. Furthermore, there are significant safety considerations for pedestrian, bicycle and vehicular traffic associated with the Proposal. We believe that the TSMP has underestimated those implications and that further consideration should be given to this matter before the TSMP is finalized and the South of Eastern Official Plan Amendment (the "OPA") is adopted, permitting the extension of Woodfield Road.

#### **Background – Canada Post – South Central Processing Facility**

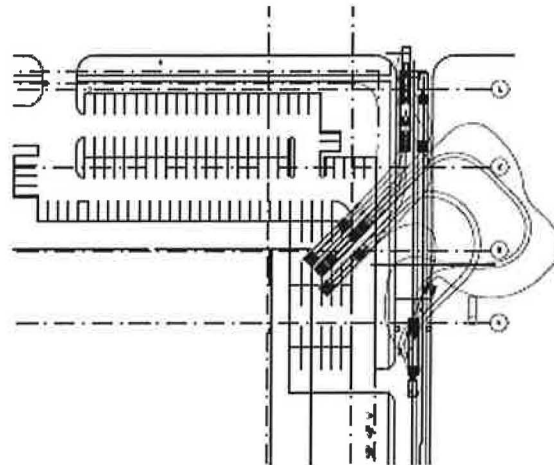
The South Central Processing Facility is the largest and busiest mail processing facility in Canada, with 40% of our country's mail originating from this building. Our processing facility operates 24 hours per day, seven days per week, processing 8 – 10 million pieces of mail daily. The processing, shipping and receiving schedule, which is logistically measured in minutes, is absolutely critical to meet our GTA, regional and national customer service standards. Efficient traffic flow to and from this facility is thus critical to our ability to meet our service obligations not just to the GTA, but also the rest of our network across Canada. We are updating information about our vehicle movements with the traffic engineers that we have retained, however, the fact that our processing plant is bordered by two dead-end streets has contributed to the safe and efficient movement of the hundreds of trucks, tractor trailers and passenger vehicles that move in and out of the processing plant every day.

## WOODFIELD ROAD EXTENSION

### Traffic Implications

Canada Post has recently retained a leading Engineering firm to review the traffic impacts associated with the Proposal. During their initial review a number of concerns were identified. To fully review and provide engineering commentary on the traffic implications, our consultants require access to data on existing and predicted traffic volumes that formed the basis of the proposed extension of Woodfield. We kindly request that this data be provided to us. There is also some uncertainty about the intended signage and signalization of Woodfield at the intersections with Eastern and Lake Shore. We also request any data and analysis that was considered by the City in support of this extension. The initial view of our consultants is that there could be significant interference with street traffic flow and our operations if the extension is permitted.

Currently there are 3 high docks on the east side of our Plant that accommodate 48 foot trailers. Trucks accessing those high docks use Woodfield while they maneuver into the high-docks. The new traffic from Eastern to Lake Shore generated as a result of the Proposal would frequently be stopped while our trucks maneuver into the loading docks. Leaving aside the traffic delays, this would create a significant safety risk to other vehicles as well as cyclists using the new cycle lanes. There will also be a negative impact to our operations as truck drivers will need more time to work around the increased vehicle and cycle traffic. We are unaware of the projected implications of the changes on pedestrian traffic but we assume there will be increased pedestrian traffic to Lake Shore and hence increased risk to pedestrians, as well as potential interference with our operations as trucks wait for pedestrians to pass. Even with existing traffic there are challenges, as illustrated by the drawing below.

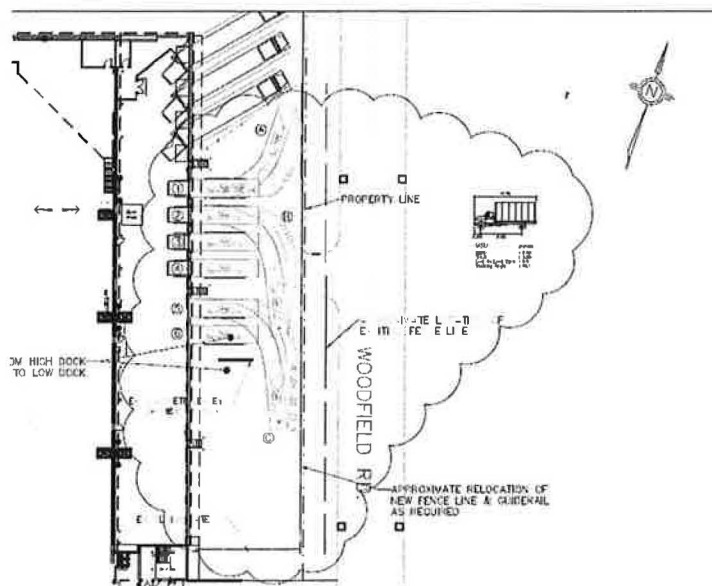


We also note that we have a total of four access points on Woodfield, all of which would be adversely affected by increased vehicle, cycle and pedestrian traffic. We are asking our consultants to study all of these.

The cross-section of the proposal for the Woodfield extension includes a centre turning lane. We would appreciate receiving further details on that so that we can review it with our engineers to understand the need it is intended to address and the implications for the four access points to our plant. There also is an indication that a parking lane would be provided for part of the street. We would appreciate more information about that as well.

### Implications for our Plant Operations and Layout

The changes to Woodfield set out in the TSMP show a widening of the travelled portion of the street to three lanes, an enhanced boulevard and the creation of slightly elevated cycle lanes on both sides of the street. Based on the TSMP drawing and the best information available to us today, the Proposal would require the City to relocate our security fence and safety barrier closer to the building and to remove a significant portion of our paved truck parking and maneuvering area. We had the implications of moving our existing security fence and safety barrier reviewed by a specialist consulting firm. That study shows (see figure below) that we will lose the use of 3 of the 6 existing high docks because there will no longer be enough maneuvering room within the fenced area for trucks to back up to the docks. The current docks were installed over 10 years ago and the security fence was added shortly after, (to augment the existing safety barrier) to increase the security of the mail and enhance pedestrian safety.



These high docks are critical to dispatch for daily delivery, as well as receipts for processing of originating mail. Eliminating half of them will have a significant impact on our ability to meet cut off times and processing windows for both local and national deliveries.

#### **Comments Regarding Properties on the east side of Woodfield**

Please advise us how the properties on the east side of Woodfield Road are intended to be dealt with for the proposed right of way compliance. There would appear to be parking and access points within the road allowance on that side of the road.

We note that the most recent building approved for construction at the base of Woodfield on the east side has an entrance that would appear affected by the proposed extension works as well as creating another potential risk for traffic (including our trucks) and pedestrians. We are assuming the Lake Shore access at the base of Woodfield would not encroach on Canada Post property and that the storage facility entrance on the east side will be dealt with accordingly. Please confirm.

#### **New Watermain**

We understand from the TSMP that a new watermain is proposed to be installed on Canada Post property, on our private access area between Woodfield and Knox. We would appreciate more information to share with our experts so that we can understand what this watermain would service, the timing, the infrastructure requirements and impacts on our operations. That would help inform our decision on whether we would support this infrastructure work on our property.

#### **Timelines for Implementation:**

Is there a more concise timeline for all of these proposed changes, assuming that they go forward? For example will some of the works be phased? This would help us better understand the implications and inform some of our facilities planning decisions.

#### **Commissioners Street**

A significant area of concern to Canada Post for the Commissioners Street component of the TSMP and Port Lands Official Plan Amendment is the impact of the proposed changes on street parking. That street currently enjoys the provision of street parking which is utilized by our employees, suppliers and customers. We request that street parking continue to be permitted under the redevelopment in order to help address the need for parking in this area. Should street parking be eliminated, we submit that the City should provide alternative public parking to compensate for the loss of street parking.

### Summary

We ask that the City consider these comments in the context of the final approval of the TSMP. As well, we ask for the opportunity to meet with City staff as soon as our consultants have completed their review. We will be unable to provide a further submission in time for the Planning and Growth Management Committee meeting on November 15<sup>th</sup>, 2017. However, we would like to work with City staff to try and resolve some of our concerns and to explore potential mitigation measures. We would very much like to do so before the meeting on December 6<sup>th</sup>, 2017, for which the OPAs are scheduled for adoption by Council. It is our current intention to make a written submission to Council in advance of that meeting, as we do have serious concerns about these matters.

We look forward to hearing back from you regarding our questions and concerns.

Yours truly,



Jim Douglas  
General Manager, Real Estate



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Monday, December 4<sup>th</sup> 2017

City Clerk  
City of Toronto  
100 Queen Street West  
Toronto ON M5H 2N2

Dear Ms. Watkiss:

**Re: City Council Meetings December 5, 6, and 7 2017 – Proposed Adoption of the South of Eastern Transportation Official Plan Amendment (“OPA”) - Port Lands Planning Initiatives – Final Report (PG24.6)**

Canada Post Corporation is the owner of the property known municipally as 969 Eastern Avenue, which is the location of our South Central Processing Plant (the “Plant”). We are making the following submission to City Council regarding the adoption of the above-referenced OPA as it relates to the proposed alteration and extension of Woodfield Road from a dead-end street to a significant traffic link between Eastern Avenue and Lake Shore Blvd, and the associated works (the “Proposal”). This OPA would enable the implementation of the Proposal as contemplated by the Port Lands and South of Eastern Transportation and Servicing Master Plan (TSMP), also under consideration by Council.

By way of background, our Plant is the largest and busiest mail processing facility in Canada, with 40% of our country’s mail originating from this building. Our processing facility operates 24 hours per day, seven days per week, processing an average of 14 million pieces of mail daily. Hundreds of trucks, tractor trailers and passenger vehicles move in and out of the Plant every day and safe, efficient traffic flow is critical to our operations and our ability to serve Canadians.

Representatives of Canada Post met with City Staff several times during the Port Lands and South of Eastern Transportation and Servicing Master Plan (TSMP) process. We also provided a submission letter to the City dated November 13, 2017 setting out our interim feedback and comments regarding the proposed OPA and the TSMP. In the meantime, our consulting engineers and planners continued their examination of the impact of the OPA and the TSMP on our Plant and we now make this submission directly to City Council.

Based on our review and that of our experts, the Proposal has the potential to significantly affect our operations and the safety of vehicles, cyclists and pedestrians on Woodfield Road. There are four truck access points on Woodfield from our Plant for pickup and dispatch by large trucks and tractor trailers. The extension of Woodfield Road and related works will result in increased vehicle, cycle and pedestrian traffic. As trucks maneuver in and out of our dock areas the increased traffic has significant potential for interruption of our operations while our truck drivers wait for breaks in the traffic. There is also a related safety concern for drivers, cyclists and pedestrians as they interact with our trucking operations.





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We have been advised by City staff that Canada Post will be involved in the detailed design of the Woodfield extension and related street and boulevard improvements contemplated by the OPA and the TSMP. We encourage the City to explore detailed design measures to mitigate the operational impacts and safety risks, such as:

- implementation of traffic calming measures and lane layouts that help facilitate our truck movements.
- place any dedicated cycle paths on the east side of Woodfield so that our trucks would not be required to cross the cycle paths.
- to construct the cycle lanes even further east on City lands by the *Gee and Tubbs Field*.

We look forward to engaging with City staff, along with our engineering and planning consultants, in the detailed design process.

We have also reviewed with the City the implications on our loading dock area on Woodfield of the landscaping and other works in the road allowance identified in the TSMP. It appears that the proposed works could require the relocation of our security fence to accommodate trees, cycle lanes and sidewalks. Based on a review by our consulting engineers, the relocation of the fence could result in the loss of six out of nine loading docks due to the reduced room for truck turning and backing up. This would have serious implications for our Plant and its operations. During the detailed design process there would be the opportunity to mitigate that effect by altering the landscaping and other aspects of the work so that our security fence remains in place. We look forward to reviewing that with City staff.

Lastly, we ask that the City align the implementation of the Woodfield extension with the timing of other aspects of the TSMP and any other road works in the area. That would enable us to understand and study the resulting traffic patterns on Eastern Avenue and the surrounding area. We would be better able to analyze and comment on the resulting overall implications, both positive and negative, of the proposed extension of Woodfield.

We appreciate having the opportunity to comment on these matters. We look forward to the continued constructive dialogue with the City and its staff.

Yours truly,

A handwritten signature in black ink, appearing to read "Jim Douglas", written over a large, stylized circular flourish.

Jim Douglas  
General Manager, Real Estate