



P & H Milling Group

A division of Parrish & Heimbecker, Limited

November 26, 2021

Truck Route Sub-Committee
Hamilton City Hall
71 Main Street West
Hamilton, Ontario, Canada L8P 4Y5

Delivered By: Email

Attention: Chair and Members Truck Route Sub-Committee

RE: Hamilton Truck Route Master Plan Update (PED 19073(b))

We write to provide comments with respect to the Hamilton Truck Route Master Plan Update and the recommendations of the City's Transportation Planning and Parking Division, to the Truck Route Sub-Committee as contained in the related staff report for November 29, 2021.

Parrish & Heimbecker Limited ("P&H") has operated a grain terminal and flour mill at Pier 10, since 2008. We were encouraged to locate in the Hamilton port both by the City and the Port Authority. P&H receives and ships a high volume of grain and flour, which involves hundreds of truck movements per day. As such, we are key stakeholder in the truck route planning process.

As a food manufacturer, it is our strategy as a company to provide the highest quality and optimum freshness of our flour product to markets on a 24/7 schedule. Often our products are made to order, with little lead time and quick turnaround requirements. Efficient transportation routes are vital to our business, both for the grain and flour components. Efficiency is critical to competing effectively with global scale operations and larger agricultural regions like the US and Brazil. At the same time, local distribution of flour to not only the surrounding regions, but also within Hamilton itself, is vital to our Milling business.

Our trucking operations are differentiated between grain shipments (inbound and outbound) and outgoing flour deliveries from our mill. Grain shipments arrive by ship at Pier 10 as well as from external providers by truck from all directions. Grain is milled on-site to produce flour. Our flour product is subsequently delivered by P&H using the most efficient routes available. Approximately two-thirds of the grain truck traffic use the Wellington/Victoria corridor, and about one-third uses the Burlington corridor. For flour deliveries, we estimate almost half of the truck traffic uses the Wellington/Victoria corridor.

We have reviewed the October 26, 2021 Hamilton Truck Route Master Plan Update - Final Report (the "Report") as well as the Truck Route Master Plan Update City Report No. (PED19073(b)) and wish to provide some commentary in response, especially as it pertains to the proposed routes and corresponding restrictions. P&H understands the need of the City to balance the factors set out in the Report, including safety, livable streets and economic impact.

Our primary concern lies within the Wellington/Victoria/Cannon/York circuit, and restrictions with respect to maximum number of truck axels (5) permitted on certain routes. The road segments in this area proposed to have a 5 axle maximum are shown as red on Figure 4.12 of the Report. The limitation to 5 axels effectively eliminates our ability to operate within this area of the City or to use western/southern routes to access highways in that direction without first taking a more circuitous route to the east. The direct economic impact of these restrictions is expressly recognized on pages 63 and 64 of the report, and the extra time and cost per trip to arrive at the Wellington/Burlington intersection is quantified on page 65. The P&H facilities are precisely at this destination, and therefore the impact on P&H is quite clear.

All of P&H's flour trucks, save one, have more than 5 axels. This means that essentially all flour deliveries are affected by the 5 axle limitation. This limitation will also mean that certain areas within the City where flour customers are located, or may be located, will simply not be accessible. Grain trucks almost invariably have more than 5 axels, and are not P&H owned and operated vehicles; P&H has no control over grain trucking. Essentially all grain trucking will be directly affected by the proposed 5 axle limitation, resulting in the economic costs noted in the Report, and potentially putting Pier 10 at a competitive disadvantage.

The Report notes at page 64 that, as a result of the impact set out in Exhibit 5.4, "special truck travel permits may be provided for selected businesses who may be especially impacted by these additional restrictions." Given P&H's location, there is no question that P&H is one of those businesses that will be "especially impacted." Accordingly, if the TOM Division is directed to prepare an amendment to the City of Hamilton Traffic By-law 01-215 in accordance with Recommendation (d) of the staff report, P&H urges that the By-law amendment incorporate the proposed wording set out on page 68 of the Report. On page 68, the proposed amendment to the Traffic By-law includes a provision exempting vehicles operating under a special permit from the prohibition on "large heavy vehicles" otherwise applicable.

The opportunity to seek a special permit may be important to P&H in certain circumstances. P&H would be pleased to work with the City in defining the parameters of special permit availability, which would allow for the ability to access crucial transportation corridors (highways) when circumstances require. This would reflect the reality of Port-based activity, can be readily monitored and enforced if necessary, and would still serve to reduce truck volumes in the 'red' areas in Figure 4.12 by prohibiting truck movements unrelated to Port businesses.

Further, it is recognized that restriction on the south and west truck routes with respect to the number of truck axels, will serve to increase congestion at key intersections serving port truck traffic, particularly at the Wellington / Burlington intersection. Truck traffic volume is anticipated to continue to increase as the port successfully attracts more business. Traffic will be forced to concentrate

movements to and from the Port onto fewer routes, which may extend travel times beyond that accounted for in the Report. We notice that while Recommendation (e) in the staff report speaks to design of future network conditions, there is no recommendation directed to monitoring the immediate traffic impact of implementing the Recommendations. We strongly urge the City do so, particularly in light of the concern about increased congestion.

We are committed to working with the City toward an equitable Truck Route Network that balances the needs of industry with the safety and livability of neighbourhoods. We encourage the City to take a strong stance on making the chosen route network as efficient and robust as possible. This would include monitoring the impact on the usability of the Network due to the axle limitation; immediate improvements to the routes as warranted; and a commitment from the City to consult with stakeholders after implementation to gauge impacts and work with industry to rectify any unforeseen issues.

We thank the Sub-Committee for its consideration.

Regards,

A handwritten signature in blue ink, appearing to read 'Mark Hebert', is positioned above the printed name and title.

Mark Hebert
National Transportation Manager (P&H Milling Group)

Cc: Omar Shams, Project Manager, City of Hamilton