

Addendum to May 13th JCRA Feedback on McIntosh Perry March 2021 Response Letter to Paradigm Review

Re: Paradigm Technical Review 2nd Submission dated April 27, 2021

This Addendum should be read in conjunction with the original May 13th Letter to Ward 3 Councillors, as it is intended to amplify our particular concerns identified under Points 3 and 5 of that Letter.

JCRA has reviewed the above noted Paradigm report. We are not in agreement with Paradigm's position that eastbound left turns in and out of the facility via the new west access driveway are safe.

McIntosh Perry's November 2020 updated Traffic Report notes that there will be 487 DSP drivers using the west access for entry at the beginning of their shift and exit at the end of their shift, in their personal vehicles, during peak periods. There will be 184 DSP drivers doing the same during standard periods.

When we carried out the earlier analysis of the west access, traffic was minimal. However, the November study introduced a change by indicating the west access would be used by DPS drivers in their personal vehicles.

This substantial quantity of mandated additional traffic using the west driveway poses significantly increased safety concerns for drivers, pedestrians, and cyclists which we feel the need to identify and comment on. Here is why:

1. The 487 (or 184) DSP drivers will enter the site at the west access from Cornwall, either eastbound or westbound. Westbound should not pose significant issues given it is a right turn, while allowing eastbound traffic to make a left-hand turn to enter at the west access will require them to cross two lanes of active westbound traffic on Cornwall, with the attendant safety issues.
2. The 487 (184) DSP drivers are also required to exit the site at the west access and will be permitted to turn left (eastbound) as well as right (westbound) on Cornwall. Given the likely non-local origin of the many of the DSP drivers, the majority of exits will probably require left turns to go east to the Cornwall and Ford Dr. intersection and then north to the QEW.

3. The study attempts to address the sight line needed for drivers to safely turn left from the site, but it doesn't address sight line issues for vehicles driving east around the blind curve on Cornwall and arriving at the site at fairly high speeds with cars crossing 3 lanes of traffic to merge into eastbound traffic on Cornwall.
4. It seems clear that the additional mandated traffic volume making left turns will pose substantial safety issues, and it amplifies our earlier comments on the inadvisability of permitting eastbound left turns from that access for reasons of sightlines and potential tailback conflicts with eastbound left turning traffic at the Cardiff signalled intersection.
5. We still haven't seen the detailed design of the eastbound left turn lane for the Cardiff site entrance, so the problem of "fitting in" any left turning traffic (even cars) from the west access into a tailback eastbound entry lane to the property from Cardiff has not been resolved, and therefore still does not address the serious safety issue.
6. As stated in our letter, it is JCRA's view that aligning the east driveway with the existing Cardiff traffic signals would resolve the safety concerns of left turns at this site. While that option increases the impact of the traffic and noise on nearby residents, it resolved the safety issues of high volumes of vehicles turning left across multiple lanes of traffic. Adding high volumes of left turns to the west access means the safety risks of left turns continues to exist.

The Paradigm report appears to be satisfied that there are no safety concerns related to left turns at the west access based on the assumption that driver behaviour will always be rational and sensible, as outlined below in the MP report:

Through their field work they found that this sight distance is provided for the southbound left turn if the driver first stops behind the north side sidewalk and then pulls ahead to just beyond the edge of the north curb of Cornwall Road and into an area that would be "protected" by the proposed new westbound right turn lane at this access. We agree with this assessment of the sight line and can confirm that the practice of moving ahead to the edge of the roadway after first stopping at a stop bar or prior to crossing a sidewalk is consistent with the guidance for exiting a driveway as found in the Highway Traffic Act (s. 139(1) and the Town's Traffic By-law 1984-1 (s. 4 (1)(a)).

This is an unrealistic (and too complicated) assumption that drivers will perform the specified actions, particularly given the number of drivers expected to use this west

driveway. If human behaviour in vehicles consistently adhered to the guidance provided in the Highway Traffic Act, there would not be collisions on the road network.

Potential solutions to these safety concerns include:

1. Eliminate all left turns in and out of the facility with a centre median to physically prohibit left turns at both driveways. Only right turns should be permitted. In this option, leave the existing east access as it currently is situated.
2. Eliminating all left turns in and out of the west access to the facility with a centre median to physically prohibit left turns. Only right turns should be permitted.
3. Signalize the west driveway access to control traffic during left turns into and out of the property at this access.
4. If the Town has examples of similar size facilities with the comparable numbers of vehicles entering and exiting a site in periodic waves of vehicles from 8:00am to 10:00 pm making left turns across multiple lanes into and out of two entrances, these would be useful for us to see and may clarify the situation and offer other solutions to the concerns expressed here.

The more we look in detail at the underlying impacts of the proposed facility at 2175 Cornwall, the more we realise that the operation of this facility presents real safety problems to the local community. We need to understand how the Town proposes to resolve these problems, so that the facility can co-exist safely with the community without the community bearing 100% of the negative aspects of locating this facility at this site.

JCRA Comments on McIntosh Perry Letter re 2175 Cornwall Road

We have reviewed the March 22, 2021 McIntosh Perry (MP) response letter to the January 5, 2021 Paradigm Technical Review Comments, which were prepared by Paradigm on behalf of the Town of Oakville, and to other comments received from the Town of Oakville on January 27, 2021. Additionally, we have reviewed the Valcoustics Canada Noise study, and other updated documents on the Town's website.

Our comments are focussed on the issues of:

- proposed traffic flows in and out of the site and their impact upon traffic and pedestrian safety on Cornwall Road.
- Noise abatement solutions
- Light Intrusion solutions
- Landscaping opportunities
- Flood mitigation

Firstly, we would like to acknowledge that the applicant's agreed-to relocation of the site's east access driveway to the signalled intersection at Cardiff Road will substantially improve traffic and pedestrian safety on Cornwall Road, as previously noted by JCRA.

Below are specific comments on the proposed new site design, some of which were provided by JCRA in response to earlier documents.

1. *Traffic into and out of the residential area around Cardiff.*

- To address the concerns of residents living in the Cardiff Rd neighbourhood that vehicles will exit the site by driving south on to Cardiff and onto other residential streets, we propose that the Cardiff signals should have only left and right traffic light filters, in both directions (i.e., no southward exit from, or northward entrance to, the site).
- In addition, signage that indicates 'No through traffic' should also be required in addition to left and right turn only signals at the lights.
- These two solutions combined will help restrict potential traffic flow into the residential area to the south.
- There may be additional solutions that should also be considered.

2. *Tailbacks at Cornwall/Ford*

- There is a lot of discussion on the impact of eastbound tailbacks at the Cornwall/Ford intersection. At certain times these are expected to extend back beyond the rail crossing/Fire Hall area, and MP offers no real solutions, just suggesting better signage or crossing gates at the rail tracks.
- This tailback is a significant issue because it has the potential to back up vehicles exiting the site to eastbound Cornwall, which in turn may motivate delivery vehicles to use the residential street network (Cardiff, Dunvegan, Constance etc.) versus waiting on Cornwall. It may also prevent residents from exiting the neighbourhood. MP states that it should be studied further, with which we agree.
- What solutions do the Planning staff have under consideration to resolve this issue?

3. Westbound right turn at Cornwall/Ford

- The significantly increased volume of traffic going south on Ford Dr. and turning right at the Cornwall intersection needs to be accommodated.
- Changes to traffic signals at this intersection and the Royal Windsor/Ford intersection a short distance to the north should be implemented to ensure safe turning and flow of traffic at each intersection.

4. *The East Bound left turn lane at Cardiff's proposed new east access driveway.*

- Any road widening to accommodate this left turn lane should only be undertaken on the north side of Cornwall. It is unacceptable to bring a four-lane arterial road closer to residents' homes and to reduce the sidewalk and boulevard width.

5. *We recommend that there should be no left (eastbound) turns permitted into or out of the western access, as proposed in MP's Figure 8U and the text.*

- It is clearly not safe to do so, as not only is there a sightline issue (a lot of space and text is given to this discussion, which probably indicates that it should not be an option), there is also a long-left turn lane proposed for entry into the site for eastbound traffic entering at both east (Cardiff) and west accesses.
- If that eastbound left turn lane extends from before the west entrance along to Cardiff, as is proposed, how could one safely exit eastbound from the west access when that left turn lane is full unless they turn right and then perform a U-turn to join the eastbound traffic, clearly an unacceptable safety risk.
- Also, a left turn lane into the west access from eastbound Cornwall would require the road to be widened to the south; it is unacceptable to bring a four-lane arterial road closer to residents' homes and to reduce the sidewalk and boulevard width.
- Finally, to preserve the sightlines for an eastbound exit from the west access there would need to be some tree removal from the wetland at and around that bend in the road west of the west access, and this would be a continuing process as regrowth occurs.
- On both safety and environmental grounds, we therefore strongly oppose left (eastbound) turns from the west access. An effective design of the west access must be part of this site plan approval process to protect traffic and pedestrian safety.
- We recommend that a central median be installed on Cornwall from the west access along to Cardiff to prohibit left turns into or out of the site at the west access.
- There may be additional solutions that should also be considered.
- What solutions do the Planning staff have under consideration to resolve this issue?

6. Noise Abatement

- The external Noise Study conducted by Valcoustics Canada at the Town's request state that MP's proposed noise mitigations are insufficient. We agree with this, and we are not convinced that the on-site noise wall/berm being proposed will sufficiently attenuate site-generated noise such that it does not disturb the residents south of Cornwall.
- The source or reason for the noise (i.e., mandatory reverse beeping signals on all Amazon delivery vehicles) is not relevant and mitigation to reduce levels to identified limits must be implemented.
- Both rooftop mechanicals and on-site traffic noises (including "reverse beeping") need to be properly screened, and we believe that the currently proposed attenuation measures will be inadequate to provide that.
- In addition to the noise wall proposed for the site itself, we recommend construction of a new concrete noise barrier on the south side of Cornwall abutting the residential neighbourhood to replace the existing wood fence to further address the significant noise issues related to the new Amazon facility as outlined in the reports. This should be part of the site plan approval process to ensure noise levels are within acceptable standards throughout the site and across the different operational scenarios (i.e., Amazon Prime days, flex drivers, holiday periods).
- There may be additional solutions that should also be considered.

7. Light Intrusion

- We believe that the existing town-installed noise wall separation on the south side of Cornwall will not be sufficient to avoid substantial light intrusion from exiting trucks onto the upper floors of the residences on Cardiff.
- Since bedrooms are usually located on the upper floors of residences, there is substantial risk of light disturbance at night.
- We suggest that the new noise wall along the south side of Cornwall Rd., as proposed above, be built high enough to block light intrusion into residences.
- There may be additional solutions that should also be considered.

8. Landscaping

- We appreciate the additional landscaping proposed by the applicant.
- Preservation of a maximum number of trees benefits the community for both environmental and aesthetic reasons.
- The retention of the Kentucky Coffee trees addresses this concern. Furthermore, they are a Species at Risk, and retaining them in this area is a key consideration. With the reduction in the parking lot size, retaining these trees is now feasible.

9. Flood Mitigation

- The Joshua Creek Flood Mitigation study by the Town is underway with potential flood mitigation measures identified for public review.

- The site will change substantially with a 350% increase in paved surfaces to accommodate the new parking lot. These changes will have an impact on potential flood mitigation measures for Joshua Creek, and this issue needs to be addressed as part of the SPA.
- What flood scenarios have been modelled for this property, e.g., Regional storm events, 100 Year storms?

10. Summary

We continue to believe that 2175 Cornwall Road is not an appropriate site for the facility that is currently being proposed for it under this SPA. Outstanding issues around light intrusion, noise levels, site ingress and egress, support our concern. Since these are issues on which the Town can impose conditions for site plan approval, we respectfully request that those conditions which thoroughly and substantively resolve residents' concerns are brought forward by Town staff and are met by the applicant to receive approval for this site plan.
