



Carters Professional Corporation / Société professionnelle Carters
Barristers, Solicitors & Trademark Agents / Avocats et agents de marques de commerce

Terrance S. Carter B.A., LL.B.,
TEP, Trademark Agent

Tel: (519) 942-0001 x222
Fax: (519) 942-0300
tcarter@carters.ca

September 21, 2020

SENT BY EMAIL AND HAND DELIVERED

Matt Colwill P.ENG.

Associate Director - Practice Lead, Transportation Engineering
IBI GROUP

7th Floor - 55 St. Clair Avenue West
Toronto ON, M4V 2Y7

Dear Mr. Colwill:

Re: Safety Study concerning the New Broadway Transit Transfer Station between First and John Street

I am writing as a follow up to our email exchange of September 15, 2020, as well as your email dated September 17, 2020, copies of which are attachments to this letter.

As a matter of background, I am the managing partner of Carters Professional Corporation, a law firm with 14 lawyers and offices in Orangeville, Toronto and Ottawa. Our Orangeville location, which is our head office, is located at 211 Broadway. The building is owned by one of our management companies, as is the neighboring building at 207 Broadway that is occupied by both our law firm and The Lighthouse, a local charity that we support which provides lunch time meals to approximately 25 vulnerable individuals.

Our law firm has been in its present location on the north side of Broadway for 20 years, which is directly in front of the proposed transit terminal station on Broadway between First and John Streets ("Transit Transfer Station"). My own personal office faces onto Broadway at street level, so I have personally observed traffic on Broadway for the past 20 years, as have a number of other lawyers and staff with our firm. As such, the comments that are set out below in this letter are based upon two decades of our collective personal experience.

The following are the critical safety and health issues that we believe need to be seriously considered in relation to the proposed location of the Transit Transfer Station on Broadway, all of which clearly indicate that, from a public safety and health perspective, the Broadway location is a very poor choice:

1. Bus riders transferring from one side of Broadway to the other side of Broadway will invariably become involved in jaywalking in the middle of the block to get to their next bus quickly, as opposed to utilizing the much slower route of walking over to either First St. or John St. to cross the road safely at the traffic lights. This is already seen on a regular basis, for instance, with people running across Broadway to get to the post office and back again. The problem will only be made worse by the addition of two major bus terminals on either side of Broadway with the resulting negative impact on visibility for pedestrians.

2. Emergency service vehicles having to speed through the most congested area of Broadway require safe passage in a timely manner. Whether they are ambulances, fire trucks or police cars, these vehicles will have to deal with the addition of significant bus and pedestrian traffic (many crossing illegally), creating a much more dangerous situation than already exists. It would be just a matter of time before someone was badly injured or killed by emerging from behind a bus with limited visibility of oncoming traffic, particularly with emergency vehicles having to travel very quickly on Broadway. There was already an accident involving a fire truck colliding into the post office in 2012. Fortunately no one was injured at the time. However, the addition of the Transit Transfer Station on Broadway will only contribute to increasing the risk to public safety in this area.
3. There would be significant increased risks to the safety of vulnerable persons while they are accessing the businesses and services in the area of the proposed Transit Transfer Station, including the elderly, as well as persons with disabilities, some of whom may have hearing or vision impairments. These businesses include a number of essential services that are commonly used by vulnerable persons, including Orangeville's main post office, a Service Canada office, a church, a bank, a health food store, a soup kitchen, a memorial monument show room, a retail store, a pizzeria, an MPP office, a job placement agency, a law firm, a paralegal office, a loan company, two health clinics, a diagnostic imaging center, a traffic consulting business, a yoga studio, as well as a karate studio that offers programs for children as young as kindergarten age.

All of the affected vulnerable individuals will require, at one time or another, vehicle drop off and pick up from these businesses and services, including the drop off and pick up of young children attending programs in the immediate area. The parking spaces to be taken up by the proposed Transit Transfer Station would severely limit the ability of these vulnerable individuals (and their families) to access goods and services from these business and services. With the location of the proposed Transit Transfer Station on Broadway eliminating parking on Orangeville's busiest street, coupled with the increasing demand for curbside pickup and delivery, the Town of Orangeville will be creating a dangerous situation that encourages illegal parking, especially with delivery and courier vehicles servicing the businesses. This will lead to further traffic congestion in the area and the potential for increased vehicle and pedestrian accidents.

4. There will also be serious negative health effects resulting from the increased bus fumes affecting individuals who live and work in the area of the proposed Transit Transfer Station due to the presence of multiple buses coming and going, as well as idling their engines in this congested area of Broadway. Among those impacted by these increased fumes would be all the vulnerable individuals referenced above, including the above-mentioned 25 people who regularly meet outside The Lighthouse to receive much needed lunch meals.

In addition to considering these concerns, it is essential that your study take into account the views of people who know firsthand the threat to public safety and health that would occur from locating the Transit Transfer Station on Broadway. In this regard, we feel strongly that you need to meet one on one with all businesses and services on Broadway in the vicinity of Transit Transfer Station, as well as with residents who walk along Broadway on a regular basis. It is also imperative that you interview the emergency vehicle drivers

who travel through the Broadway corridor on a daily basis, as well as all Orangeville Transit bus drivers, to obtain their individual thoughts on the public safety impact of the Broadway location of the Transit Transfer Station.

Anything less than this level of due diligence will call into question the completeness of your study, as well as whether it will meet the acceptable standards expected of a safety study on the Transit Transfer Station's location, both of which will impact the safety and health of the public for years to come.

I will be available to meet with your team at 10 a.m. on Monday, September 21, 2020 as part of the already scheduled one hour group meeting with a small number of people, which apparently is the only on-site group meeting that will be held for some reason. If you would like to meet with me and other lawyers and staff at our firm in person to follow up on any aspect of the concerns raised in the letter, please do not hesitate to let me know and we can arrange for an in-person meeting at your convenience.

Yours truly,
Carters Professional Corporation

Per: 
Terrance S. Carter

TSC:TC
Enclosures

cc: Mayor and Council Members of the Town of Orangeville
John Lackey, Town of Orangeville
Business Improvement Area (BIA) of the Town of Orangeville
Orangeville Citizen
Orangeville Banner