

## 180 Steeles West (Mizrahi) - Transportation Considerations Report - Analysis

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COMMUNICATION - C114

CW (PH) - July 13, 2020

ITEM # 5

The **Transportation Considerations Report for 180 Steeles**, relies heavily on questionable premises and assumptions favourable to the developer. The Report opens with key provincial policy documents to legitimize its proposals. It quotes at length from the **2014 Provincial Policy Statement, the Places to Grow Growth Plan, and Ontario's Five Year Climate Change Action Plan** which all encourage increased density to reduce auto-based travel and encourage active transportation. This provides justification to slash mandated parking requirements by over half (50%) and lowball projected vehicle traffic because presumably most residents should instead be walking, biking and taking transit for all their daily mobility needs.

However, what they fail to explain is that what all these policy documents encourage is not just any kind of unchecked density, but, very specifically, **mixed-use** density. Mixed use is an absolutely essential component of sustainable density, a theme that is emphasized repeatedly in each of those documents.

Sadly, this proposed project is anything but mixed use. Other than 3,200 m<sup>2</sup> of retail, over 90% is devoted exclusively to residential condos. In plain language that means that all these thousands of future residents will need to commute to a job or to school each day, travelling some distance to a location that is most likely not within walking or even biking range for most. How will they get there? Spoiler alert: the Report does not answer this fundamental question.

What's more, it means that heaviest travel is all going in one direction during peak periods, as almost no one is coming to this site to work. That is a nightmare scenario for any transit planner. The problem is further compounded by the many other development proposals in this immediate area, which all weigh overwhelmingly on the residential component. There are no office towers, schools, institutions, community centres, open spaces, or entertainment attractions.

This is not a recipe for an accessible, sustainable, self-contained walkable community that is the cornerstone of all those provincial policy documents encouraging densification. Rather it is simply more residential sprawl, just vertical instead of horizontal.

### Proposed Yonge North Subway Extension

Although it does not explicitly state this in the Report, this proposal's density exemption justification ultimately relies on support for the unbuilt YNSE. It needs to be recognized that the subway extension to Steeles was already fully justified and approved based on the existing proposed density levels in the Secondary Plan. In fact, even under current densities (pre-Covid) thousands of riders were coming in by bus from Steeles to Finch Station during AM Peak. Rather than providing further unneeded justification for the extension, substantial increases to the currently approved densities could create loading and crowding issues especially if it is overwhelmingly residential.

## **The Yonge and Steeles Area Regional Transportation Study**

The **Yonge and Steeles Area Regional Transportation Study** approved by Regional Council in 2015, consolidated recommendations of ongoing studies, and developed an overall plan to ensure growth is accommodated in a predictable manner that does not overwhelm the transportation system prior to the subway extension. One of the key conclusions out of this study is that the road network is already failing today during the peak periods and there are few opportunities to increase arterial road capacity. This impact cars, but also the buses which are the mainstay of current transit service in the area.

### **Transit Travel Review 5.3**

Despite its heavy reliance on the future YSNE, the Report acknowledges that it could be a few years before the subway is extended. In reality, it could even be decades until completion. With the traffic and parking issues that will be discussed further on, much of the transportation will need to be carried by existing local bus service.

The Report provides Table 3 showing current level of service for the bus stops that are in the immediate area and proudly proclaims that three of them are at a Level of Service (LOS) rated “A”. What they fail to point out is that this rating was only based on peak PM hour. At that time, all the travel would be headed inbound to their site as people are returning home. In that situation, the relevant stops are westbound on Steeles and north and south on Yonge. All of these stops fall in the “E” category. Similarly, if LOS information was available for AM peak, it is likely that eastbound Steeles would also fall into a similarly low category or worse.

As pointed out in the Regional Transportation Study, buses travelling along Steeles to and from Finch Station are frequently at capacity and caught in congestion during peak periods. We agree with the Report that “Should the Yonge Subway Extension be constructed, a subway station at Yonge / Steeles would significantly improve both transit and traffic performance in the immediately surrounding area.” But in the years until that is a reality, a significant increase to the current bus ridership would present serious problems. This has not been accounted for.

It is mystifying that despite repeated mentions of the subway extension throughout the Report, nowhere is there any attempt to provide the basic numbers on the ridership that would be generated by the proposed development to support the YSNE. As we note further on, the auto trip numbers have been severely downplayed to enable slashing parking allowances and support the contention of minimal traffic impact even during peak hours. That raises the obvious question as to how then most of the thousands of non-driving residents will be commuting each day. Nowhere does the Transportation Report provide these numbers or even offer an explanation.

**The overall lack of any transit ridership analysis is a serious flaw for a project that is essentially based on having access to top tier transit service as its primary justification for density twice that allowed in the Secondary Plan.**

## Vehicular Travel Assessment 8.0

The Report gets off to a good start here with the TTS data for the area, which is the gold standard of travel surveys- an objective 3<sup>rd</sup> party (U of T) rigorous survey. But those numbers don't support the low level of auto use desired, so instead they turned to the TTS data on the Finch-Yonge area which obviously provided much better transit use numbers.

But, even that wasn't enough, so the consultants ignored the rigorous TTS data and used their own small single day survey at 3 condo complexes outside of the area. We don't know what methodology was used by their own survey team, but we do know their motivation. They seemed to use the number of suites as a basis for their analysis. But, did they account for vacant units such as unoccupied units at World on Yonge owned by foreign investors? Furthermore, all three buildings are within close proximity to large office towers. We don't know how many of the residents chose to live there to walk to their office.

By ultimately relying on their own in-house survey from outside areas, rather than the 3<sup>rd</sup> party objective TTS numbers in the target area, the traffic generation figures are highly suspect. This is evident in the numbers generated in their analysis based on these weak assumptions. And to further compound the low numbers, the consultants have deducted the current peak hour trips in and out of the existing plaza. Again, who surveyed the current trips at the plaza? Yes, this was done in-house as well.

Based on these formulas from their own in-house surveys, some 4,000 residents from over 2,000 units are expected to generate a grand total of 290 new trips out during AM peak, and only 140 back in during the PM peak. It is easy to see how these kinds of suspect calculations, which form the basis of all the traffic projections, are carefully crafted to support their contention of minimal impact on future congestion, back-ups at study area intersections, and vehicle movements and traffic flow on surrounding roads.

Contrast this consultant Report with the objective **Yonge and Steeles Area Regional Transportation Study** which in 2015 stated that "few would argue that the existing network is near or at capacity today. Key arterial to arterial intersections are operating at Level of Service E or F in the AM and PM peak periods. Similarly, buses travelling along Yonge Street experience high load factors and are delayed due to congestion and curb-side activities. Walking and cycling networks are also deficient in terms of comfort and connectivity."

Based on the York Region transportation demand model, the Study projected that AM peak hour auto driver trips from the study area will increase by 7,900 auto trips or 36% by 2031 under a high growth scenario (and this was based on the much lower densities in the Secondary Plan). Even with more aggressive modal share targets in place, for example a 50% sustainable mode share, auto driver trips will still increase significantly. Accommodating any growth in automobile trips is only possible if traffic from outside of the study area is diverted or if drivers shift their travel times from the peak hours.

### Trip Assignment 8.3

Another concerning aspect of this proposal is the main entry into the complex. In the “interim”, which means until a new external road is built by the City at Royal Palm Drive, all entry and exit will be onto Steeles at a non-signalized intersection. Consequently, only right in and right out movements will be allowed. That means any trips heading to Yonge will be forced to travel through local streets to eventually head east. Cars approaching from the west will similarly need to proceed past the development, through local roads to eventually turn back westbound on Steeles. This will create a great deal of further congestion on local roads such as Hilda. Again, the lowball trip generation numbers have resulted in a serious underestimating the impact on these parts of the road network.

### Vehicular Growth Rates 8.5

Almost shocking is the Report’s projections of traffic growth to 2024. Supposedly considerations were taken for some of the other major proposed developments in the Yonge corridor. Despite all of that, the consultants confidently predict that “corridor growth rates were calculated to be **negative** for Yonge Street in both the AM and PM peak hours”, and similarly on Steeles, a conservative rate of **0%** was applied in the PM peak as **negative** growth was observed.

The idea that traffic will actually remain static, much less shrink, on these arteries over the next few years defies reason. It certainly contradicts the **Regional Transportation Study**.

### Vehicular Parking Considerations 10.0

The Report carefully calculates the parking requirement based on standard Zoning bylaws. The grand total for all the residents, visitors, delivery, service, and shoppers comes to 3,858 parking spaces required. But the consultant has determined that the VMC standards are more fitting, so slashes that number by almost half to 2,050. The entire case for such a drastic cut in parking spaces is based on YSNE and a surrounding transportation context equivalent to the master planned community of VMC.

As already described, the YSNE could be years away, unlike the VMC which had an operating subway prior to any condo occupancy. Furthermore, the VMC as a planned self-contained, mixed-use community naturally reduces the need for a car. It is designed to make it easy to walk or bike to jobs, shopping, schools, library, YMCA, community centre, large parks with hiking trails, etc. It is entirely planned to reduce or eliminate the need for a car. There is no similar master plan for Yonge Steeles and as an infill area, it would be extremely unlikely to support that level of walkability.

Having already made the leap of slashing the parking spaces from mandated 3,858 to the unsupported VMC standard of 2,050, the consultants have still not achieved sufficient space savings. So, without any explanation, they simply drop even that lowball figure even further to 1,876 spaces. No explanation.

## **Bicycle Considerations 12.0**

After slashing car parking spaces, the Report has gone ahead and decided to adopt the increased bicycle parking requirements used at VMC. Again, no mention is made of the fact that VMC is a master planned community, building an extensive system of dedicated bike lanes and trails throughout connected green spaces to promote biking. Over 17 kms of bike lanes already are in the VMC. Contrast that with the Yonge Steeles area with not a single bike lane, and where, by their own estimation the biking network is Level of Service rating at a dismal “F” throughout the area.

Despite that, 1261 bike parking spaces, will be available. However, if you are an outsider who wishes to shop at one of the handful of retail stores replacing the current plaza, forget driving there, as there is no parking for you. But you might be one of the 12 lucky cyclists to find a spot. Yes, 12 spaces for about 18 stores.

## **Conclusions**

The premises and assumptions in this Transportation Report are highly suspect. Almost all the projections rely on in-house surveys of condos in completely different contexts. Any available objective databases, such as the TTS, were discarded for the analysis and projections.

Unusual projections such as negative future peak traffic growth on the Yonge street corridor and Steeles raise further questions as to the overall credibility of the data and analysis.

The use of VMC standards for items such as vehicle and bicycle parking requirements has no substantive basis given the many major differences in context and planning.

There is no proper analysis provided of existing transit capacity and what measures would need to be taken to provide sufficient service in the intervening years until the possible build of a Yonge subway extension. This is particularly problematic as the entire development relies heavily on high transit use.

The overall lack of any projected transit ridership analysis is a serious flaw for a project that is entirely based on having access to top tier transit service as its primary justification.

Due to the many questionable assumptions, unreliable data sources and incomplete analysis, this entire Transportation Report is in need of a comprehensive Peer Review by objective transportation planners.