

## 100 Steeles West (Salz) - Transportation Considerations Report - Analysis

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I have lived on North Meadow Crescent since 1991.

The **Transportation Considerations Report for 100 Steeles West**, relies heavily on highly 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 apparently provides encouragement to slash mandated parking requirements by over 60% 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 policy documents.

Sadly, this proposed project is anything but mixed use. Other than 1,203 m<sup>2</sup> of retail and a car dealership, over 98% 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 impacts 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 triple 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 their own survey they determined that currently 75 trips leave the plaza 8-9AM. This is a plaza of predominantly small restaurants, salons, and shops which mostly don't even open until well after the morning rush. It is strictly commercial, so there is no one living there currently. It is odd that there are 75 cars leaving this plaza during rush hour before 9AM. Compare this to the projected number of trips out from the proposed 1,800 units and thousands of residents during morning peak: 264. The consultants then deduct the 75 supposed current trips, to claim that only 210 new trips will be generated.

The situation is even more extreme during evening peak, where the potentially thousands of returning residents are expected to generate a mere 208 trips, set off against the supposed current level of 170 into the plaza. It is easy to see how these kinds of figures, which form the basis of all the traffic projections, are carefully manipulated 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.

### **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 3,545. But the developer has determined that these numbers are not applicable to this development. So, with absolutely no explanation, the consultant simply slashes that number by an astounding 60% to 1,414 in a 5 level underground garage.

Although not a word of explanation is given for these drastic reductions, it is likely that the entire case is based on the future subway extension. As already described, the YSNE could be decades away. Where is the transportation plan for the interim? Furthermore, areas that support lower parking needs, like the VMC are planned self-contained, mixed-use developments that naturally reduces the need for a car. It is designed from the start to make it easy to walk or bike to jobs, shopping, schools, library, YMCA, community centre, large parks with hiking trails, etc. There is no similar master plan for Yonge Steeles and this condo development only exacerbates the situation.

### **Loading Considerations 11.0**

**Loading zones.** The Report notes that the Block 1 auto dealership GFA requires two large loading spaces. But none is included in the proposal. Instead they plan two in Block 2 down the road and around the corner and must share it with 2 large buildings and other retail for all deliveries. More problematic, is that one of the 2 loading spaces is meant to accommodate a municipal garbage truck. So the question becomes, what will happen to the auto carrier trailer trucks that deliver cars to the dealership around the corner and up the street? These carriers are 20 meters long before their ramps are lowered. This far exceeds the one 11 meter loading space dedicated to delivery trucks. As a result, all the truck car carriers will most likely stop on Steeles to unload vehicles being delivered. This is exactly what happens now on Hilda and on Steeles at car dealers located there. These unloading car trailers occupy an entire lane of traffic for extended periods of time causing major disruptions to cars and especially buses.

Once again, it must be noted the ultimate irony of this dense development premised largely on a massive reduction of car use, elimination of parking spaces, promoting alternatives to the car; dedicating almost all of its prime retail space to selling ... unbelievably, more cars.

### **Bicycle Considerations 12.0**

After slashing car parking, the Report has gone ahead and decided to adopt the increased bicycle parking requirements used at VMC. No mention is made of the fact that VMC is a master planned community building an extensive system of dedicated bike lanes and trails through connected green

spaces to promote biking. Over 17 kms of bike lanes already in the VMC. Contrast that with the Yonge Steeles area with no bike lanes, and where, by their own estimation the biking network is LOS of F.

Despite that, 1100 bike parking spaces are planned, mostly underground. By the way, if you are an area resident who wishes to use one of the handful of retail that is replacing the current plaza, forget driving there, as there is no parking for you. But you might be one of the two lucky cyclists to find a spot. Yes, 2. On the other hand, if you are going to the car dealership, there is bike parking available for 40 cyclists. Of course, future residents of the development can easily walk to the dealership. However, if they do make a purchase, they will be hard pressed to find a parking spot for it.

## **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 zero 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 Report slashes the parking allotment by 60% with not a single word of explanation or support.

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

Inclusion of a 12,718 m<sup>2</sup> car dealership as the prime retail location on site will create additional traffic issues on Steeles due to lack of a loading zone. Furthermore, a car dealership as its face undermines the very foundation and main justification of the development itself to encourage active transportation.

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.