

Planning and Housing Committee
City of Toronto
100 Queen St. West
Toronto, ON
phc@toronto.ca

July 4, 2022

Re: Request to Amend the Official Plan and Zoning By-law 569-2013 (Christie's Secondary Plan Area)

Dear Members of the Planning and Housing Committee:

We are writing to request that amendment of the Official Plan to allow the Christie's Secondary Plan to proceed be delayed until a funding commitment is in place for the completion of the Waterfront West Light Rail Transit project and a fully dedicated transit right-of-way from Legion Road in the west to Exhibition Station in the east, or an Ontario Line extension westward to the Humber Bay Shores community. As active participants in the Waterfront Transit Reset and Park Lawn Lake Shore Boulevard West Transportation Master Plan consultations, as both stakeholders and public meeting participants, we believe our concerns regarding the inadequacy of transit infrastructure to support the proposed densities are well founded and reflect broad concerns held by affected communities both immediately adjacent to the Christie's Secondary Plan area and in the larger transit ridership watershed.

Absence of Higher Order Rapid Transit

The Christie's Secondary Plan is nominally a "transit-oriented development", but the proposed densities should not be contemplated or allowed to proceed without a commitment to missing higher order rapid transit. A GO station will provide higher order transit but will run on 12 to 15 min. service. That is not rapid transit, and it explains Metrolinx' projections of only 900 net new daily trips at Park Lawn GO, even under a harmonized fare structure.¹ A single GO station and surface transit running in mixed traffic is not currently considered adequate to support any comparably sized community in the GTHA, and it is insufficient for Humber Bay Shores. There are nearly 20 GO stations in the city of Toronto: none of these is expected to support an immediate community of 30,000 situated in less than 1 square kilometre with only surface transit to supplement GO.

For those who cannot reach their destination travelling on GO alone, the cost of combining it with TTC is prohibitively expensive. The current daily Presto fare to combine GO and TTC for a round trip from Mimico to Union is \$13.80 (\$7.40 more than TTC alone). Based on daily commuting, the annual cost with passes and discounts is \$3,456.00, with GO costing \$1,872.00

¹ <http://www.metrolinx.com/en/regionalplanning/projectevaluation/benefitscases/2020-04-22-Park-Lawn-Updated-Initial-Business-Case-2020-FINAL.pdf> See Appendix D

per year more than TTC alone. Annual median household income in Etobicoke-Lakeshore is about \$90,000 so the additional cost of *combining* GO and TTC for daily commuting represents 2% of pre-tax annual household income, and 4% if that household includes two daily commuters. The total expense of transit for two commuters depending on both GO and TTC is 7.68% of pre-tax annual household income.

The developer compares the Christies site to neighborhoods like High Park / Bloor-Dundas and Liberty Village in its request for parking reductions and as justification for the proposed densities. It claims that “new supporting infrastructure” is “precedent setting” and provides mobility choices comparable to “more central and transit accessible areas of the city”.² However, neither comparison is remotely accurate. High Park / Bloor-Dundas has not only a GO station but also 4 Line 2 subway stations (High Park, Keele, Dundas West, and Lansdowne), UP Express service, and yet another GO station funded and under construction (at Lansdowne)³. As far as distance to the core is concerned, Dundas West GO is only 5kms away from Bloor and Yonge. Humber Bay Shores is far more distant and greatly underserved by transit in comparison with no subway stops at all and only one planned GO station.

Comparison with Liberty Village / City Place is similarly flawed. While there is currently no subway service, there is a funded plan for the Ontario Line to provide two stations: Exhibition and King/Bathurst⁴. Moreover, it is already served by LRT service via Exhibition loop (509 and 511) and benefits from the transit priority on King St. West east of Bathurst St. where the 504B and 504A lines overlap providing headways of only a few minutes most of the day. Moreover, Liberty Village is even closer to the central core than Bloor-Dundas at only 3-4 kms providing much better opportunities for active transportation commuting as an alternative to vehicles or transit.

In fact, the communities that the developer holds up as comparable underscore the inadequacy of a single GO station and reinforce the vital importance of additional higher order rapid transit in Humber Bay Shores. That transit infrastructure is missing and must have a funding commitment in place before the Christie’s site development begins.

Inadequacy of Proposed Streetcar Loop

The proposal incorporates a dedicated transit right-of-way on the property, but that loop is inadequate for the levels of service the TTC has provided to the developer as a maximum (6 eastbound 501B, 6 westbound 501B, and 12 504B streetcars per hour - loop see “SP-24 Assumed service levels”⁵). The loop design has only one layover for the 504B which is a terminating service where operators require a break. If a second 504B arrives before the first is ready to advance into the shared 501B/504B boarding area, the second 504B will block all other

² Urban Transportation Considerations, February 2021. See p. 24.

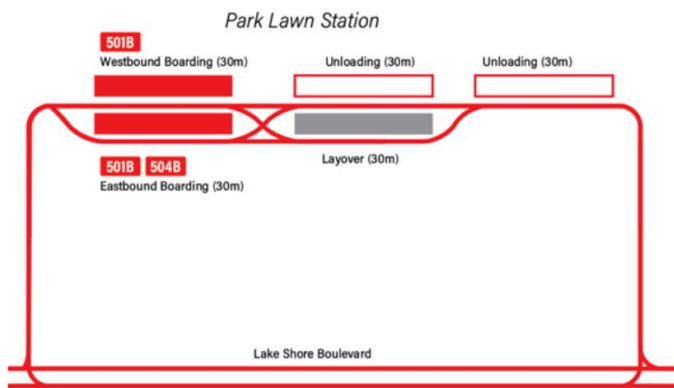
³ Urban Transportation Considerations, Appendix B, “Figure 4 West Toronto Trends,” February 2021. See p. 36.

⁴ <https://blog.metrolinx.com/2021/06/10/ontario-line-station-footprints-from-exhibition-to-queen-and-spadina-reveal-quick-connections-to-major-transit-lines/>

⁵ Urban Transportation Considerations, February 2021. See p. 104.

through movements (see TTC's diagram below). The transit loop portion of the loop road should be fully double tracked to provide more layovers and track crossovers and thereby prevent bunching and blocking of through movements at the loop.

Unidirectional Example



CONCEPTUAL UNIDIRECTIONAL ROUTING (TTC, 2019)

The TTC's Service Standards⁶ consider vehicles to be "on time" if the scheduled headways are within + or – 50%. Therefore, even "on time" 504B streetcars on 5-minute headways would reasonably be expected to exceed layover capacities on a regular basis. Four 504B vehicles scheduled for 5 min. headways could all arrive within 10 min., all with operators requiring breaks, and according to TTC standards, service is on time. The goal of the TTC is for only 60% of trips to operate on time, so even under normal operations a single layover in addition to the principal boarding platform is far from adequate for a terminating 504B route.

Failure to address streetcar loop design limitations will undermine any gains from the short ROW segment between Legion Road and Humber Loop and may even result in service and reliability degradation to 501B. The only way to ensure 504B streetcars have regular headways and do not exceed the layover capacity of the loop is if the cars are running in a dedicated right of way on their entire route. This is precisely the objective of the WWLRT, and it is the only way to achieve reliable travel times and schedule adherence.

Prioritization of Waterfront West LRT

Dating back to 1993, municipal and provincial governments have numerous times, and prior to the proposed Christie's development, affirmed the importance of the Waterfront West LRT. *Transit City* plans identified Waterfront West LRT as one of seven LRT projects. WWLRT was included in the province's 2008 list of 15-year plan *Big Move* rapid transit priorities. Many of Toronto's LRT projects identified as priorities in *Transit City* or *The Big Move* are nearing

⁶ http://ttc.ca/PDF/Transit_Planning/TTC_Service_Standards.pdf. See p.12

completion, under construction, or in planning stages while WWLRT has stalled, despite serving some of the highest population densities not currently situated by higher order rapid transit. In 2018, after the completion of the Waterfront Transit Reset consultation and study, City Council directed the Deputy City Manager and planning staff to “prepare background studies required for a Transit Project Assessment Process Environmental Assessment of a new exclusive transit right-of way from Colborne Lodge Drive and The Queensway to Dufferin Street at the Dufferin Gate, as per the preferred route identified in the report dated January 10, 2018 entitled Waterfront Transit Network Plan.”⁷ This work has apparently still not advanced. There is no precedent in the City of Toronto – or Canada, for that matter – for densities of this kind to be permitted without access to affordable higher order rapid transit. WWLRT must be prioritized for the municipal and provincial funding commitments needed to finally move the project forward.

The Park Lawn Lake Shore Boulevard West Transportation Master Plan (TMP) planners have forecasted a 52% transit mode share for a population of 71,200 in the larger ridership watershed of Park Lawn GO by 2041. This target is unrealistic and unachievable without the higher order rapid transit of the Waterfront West LRT or an Ontario Line extension westward. It would be irresponsible to permit the proposed densities without a clear trajectory for providing corresponding higher order rapid transit infrastructure.

Sincerely,
David Meurer
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Co-Chairs, SETAC (South Etobicoke Transit Action Committee)
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cc: Sarah Phipps, Project Director, Strategic Initiatives, Policy and Analysis, City of Toronto
Mark Grimes, Councillor for Etobicoke-Lakeshore
Christine Hogarth, MPP for Etobicoke-Lakeshore
James Maloney, MP for Etobicoke-Lakeshore
Kinga Surma, Minister of Infrastructure for the Province of Ontario
Caroline Mulroney, Minister of Transportation for the Province of Ontario

⁷ <http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2018.EX30.1>