



HUMBER BAY SHORES CONDOMINIUM ASSOCIATION

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July 31, 2023

Ms. Katelynn Northam
Senior Coordinator,
Public Consultation Unit,
City of Toronto

Dear Ms. Northam,

Re: Final Report for the Park lawn Lake Shore Transportation Master Plan

The Humber Bay Shores Condominium Association represents 21 condominium corporations in the Humber Bay Shores area and their residents. We have concerns related to the final report for the Park Lawn Lake Shore Transportation Master Plan (TMP).

We believe that some of the transportation plans in the TMP for Humber Bay Shores (HBS) do not meet the goals of our community. Also, the plans may be built on some significant but faulty assumptions, and failing to adjust the plans will result in long term problems that will likely be impossible to fix as our community is further built out.

The remainder of this letter sets our objectives, summarizes our current situation, and identifies key issues in the BA Group reports and the TMP, both of which addressed transportation issues in our community. The final section sets our specific requests. There are also three appendices that deal with questions related to future traffic estimates, provide a diagram of how the Gardiner ramps could be reconfigured and provide a diagram of the TMP's preferred option.

OBJECTIVES

The following are our main objectives for the community. We appreciate that these two objectives will at times be in conflict:

- a pleasant safe community to live in and move around in, not an area to get through as quickly as possible (both drivers and cyclists); and
- the ability to access areas outside of our community without significant delays and congestion – driving and public transit.

SITUATION

The Humber Bay Shores community faces significant transportation challenges. This is due to the geography of our area and the infrastructure that has been built around it.

- Our community is part of the major choke point for traffic between downtown Toronto and most of the GTA west of the Humber River.
 - At best, there are limited possibilities for increasing capacity over the Humber River.
- With the continuing build out of our community, further changes to our transportation network will be difficult, if not impossible.
- Most of the traffic into or out of our community, and much of Mimico, uses two heavily used roads: Park Lawn and Lake Shore Blvd.
 - To and from the west and north, most of the traffic from our community, and much of Mimico, uses Park Lawn and the Gardiner Expressway westbound.
 - To and from the east and northeast, most of the traffic from our community, and much of Mimico, uses Lake Shore and the Gardiner expressway eastbound, with traffic to and from the Gardiner using Lake Shore Blvd.
- Over the next 20 to 30 years, the population in our community will double from about 20,000 to about 40,000.
 - We have defined our Humber Bay Shores community as the area south of the Gardiner Expressway, from the properties on the west side of Legion Rd to the Humber River, plus the Grand Harbour condominiums.
 - The 20,000 number is based on the 2021 census.
 - Considering only the area between Mimico Creek and the Humber River, the population is expected to increase from about 15,000 to about 31,000.
 - In addition to the bypass traffic from Mimico, we have bypass traffic from the Gardiner Expressway when it is congested - e.g., AM peak and when there is an accident or construction on the Gardiner Expressway.
 - Some of this traffic often continues along Lake Shore Blvd rather than returning to the Gardiner Expressway at Brookers Ln.
- Our community, and the rest of Toronto, has a long history of allowed densities far exceeding what was previously planned or permitted. See Appendix A.1 for examples.
- Even with the HBS GO Station, other than for trips to/from downtown, public transportation provides a poor option for many trips – e.g., shopping at Sherway

Gardens, visiting friends or travelling to work in the “905” or even most of Etobicoke, etc.

- This may limit the extent to which the auto driver share of trips will / can be reduced.

BA GROUP REPORTS

The developers of the Christie Property submitted a Transportation Considerations report prepared by BA Group dated September 2019 (2019 Report), with updates dated March 2020 (2020 Report) and February 2021 (2021 Report). These reports by the BA Group addressed traffic issues in the HBS area with the development of the Christie Property.

- The reports form part of the basis for the approvals related to the development of the Christie Property.
- The reports assumed the Gardiner ramps (including westbound Lake Shore Blvd traffic from east of the Humber River) would be reconfigured to connect with Street A rather than Lake Shore Blvd at Brookers Ln (See Appendix B).
 - The 2021 Report stated that Street A and the reconfiguration of the ramps was “... key in achieving acceptable future operational context on the overall network.” (pg.59) and “... failing to reconfigure the Gardiner ramps at Brookers Ln is projected to lead to a condition where very significant congestion occurs, primarily along the westbound Gardiner off-ramp during the weekday afternoon (PM) peak hour. This forecasted gridlock ...” (Appendix F, pg. 8)
- The 2021 Report assumed that Park Lawn would have four lanes with two left-hand turning lanes at Lake Shore Blvd and the Gardiner Expressway westbound ramp.
- The reports assumed the “auto driver” share of residential trips would drop by 55% to about 26% (2019 Report, Volume 2: Technical Study, pg. 152 & 164) (although Figure 56 indicates a 30% share).
- It is not clear if the studies considered traffic associated with retail and commercial operations in the HBS outside of the Christie Property.
- It is not clear if the studies considered commercial traffic associated with the residential units – e.g., delivery vans, tradesmen, etc.
- There are further questions as to whether the reports have accounted for all the traffic that HBS will face in the future. See Appendix A.2.

PARK LAWN LAKE SHORE MASTER TRANSPORTATION PLAN

The City of Toronto has issued the TMP. We have concerns with some aspects of the plans in this document.

- In developing the TMP, the City looked at six options and decided on 4B (See Appendix C), while option 3 aligns more closely with the 2021 Report.
- Option 4B would not have the Gardiner ramps reconfigured to connect with Street A, and Park Lawn would have two lanes with only one left hand turn lane at lake Shore Blvd and the ramp to the Gardiner Expressway westbound.
- As stated in the TMP, failing to reconfigure the Gardiner ramps “Reduces traffic access to/from Gardiner Expressway with potential to discourage cut-through traffic” (TMP, Exhibit 11.17, page 169).
 - This option results in unacceptable delays exiting the westbound Gardiner Expressway and Lake Shore Blvd westbound (from east of the Humber).
 - The TMP estimates that: “During the PM peak hour, vehicles using the reconfigured Gardiner Expressway Westbound Off-Ramp to the new North-South Street experience excessive delay. Vehicles using the ramp see up to 510 seconds (8.5 minutes) of delay on the ramp due to the limited capacity on the new North-South Street, generating a queue of approximately 500 metres.” (TMP, pg. 155)
 - No estimate was provided for the impact on possible by-pass traffic compared to the reconfigured Gardiner ramps connecting to Street A.
- The TMP assumed a future population of about 30,000 with about 6500 jobs.
 - This was based on the area south of the Queensway between the Mimico Creek and the Humber River.
 - Unlike the TMP, we have defined our area as including the area from properties on the west side of Legion Rd (but south of the Gardiner Expressway) resulting in an estimated future population of about 40,000.
 - From a traffic perspective, the additional HBS area to the west of Mimico Creek is an integral part of our community.
- It is not clear how the TMP projects traffic flows from 2019 to the future – e.g., what assumptions are made with regards to development and population.
 - This applies to both the HBS and the surrounding area.
 - As set out in Appendix A.3, the TMP appears to underestimate the traffic associated with the Christie property.

SPECIFIC REQUESTS

In planning the transportation network for HBS and the surrounding area, the City should take a very long-term view and maximize flexibility to deal with unknowns.

- The HBS will have to deal with the City's current planning for 100+ years.
 - The City cannot merely look to 2041.
- With ongoing development in the HBS and surrounding area, it will soon be impossible to make major changes to the road network – other than reducing traffic lanes.
- Plans must recognize not only the development that is currently being projected but recognize that actual future development may significantly exceed what is currently planned / allowed (See Appendix A.1).
- The City is assuming a dramatic reduction in the share of auto driver trips in HBS from 43% in 2011 to 25% in 2041, a 40% reduction (App G4, section 2.5.2).
 - In making such a dramatic assumption, the City should leave some room for error.

The traffic plans should be reviewed to ensure they reflect recent construction, and possible further development with densities significantly greater than what is currently planned or permitted.

- There are at least questions as to whether the BA Group reports and the TMP have underestimated future development and the associated traffic in both HBS and the surrounding area.
 - For example: the ESSO site, the XYZ Storage site, further development on Lake Shore Blvd down to Lake Crescent, development north of the Mimico GO Station that exceeds previously planned amounts by 2.5 to 3 times, the south side of the Mimico Go Station, the west side of Park Lawn between the Gardiner and The Queensway, the Sobeys Plaza, or even the Ontario food Terminal.
 - Appendix A.3 provides two recent examples where planned development now far exceeds what was previously planned for the site.

Reconfigure the Gardiner ramps to connect with Street A.

- This would tend to keep traffic to the north side of our community rather than coming down to Lake Shore Blvd.
- It would significantly reduce congestion in the section of Lake Shore Blvd between Street A / The Marginal Blvd and Brookers Ln, along with roads connected to this section.

- There should be an explanation as to why the 2021 Report was incorrect in stating that the reconfiguration of the Gardiner ramps was “...key in achieving acceptable future operational context on the overall network.” and why failure to reconfigure the ramps would result in gridlock.
- We do not believe having a new street to connect Brookers Ln to The Queensway instead of reconfiguring the Gardiner ramps (we understand the two options are incompatible) is in the best interests of our community.

Do not build the road connecting Brookers Ln to The Queensway.

- The road would encourage traffic to come down into our community to connect with Lake Shore Blvd and increase the traffic that the Gardiner ramps connecting with the new street would have to deal with.
- Having the Gardiner ramps (including westbound Lake Shore Blvd traffic from east of the Humber River) connect to a two-lane road with through traffic and traffic lights at both locations where the ramps meet the new road, would result in significant congestion and impair our community’s access to the Gardiner Expressway eastbound and from the Gardiner Expressway and Lake Shore Blvd westbound.
 - In the PM peak hour, there would be an estimated 8.5 minute delay on the off ramp from the Gardiner / Lake Shore Blvd westbound.

Maintain four lanes on Park Lawn with two left hand turn lanes at Lake Shore Blvd and the access ramp to the Gardiner Expressway westbound.

- Park Lawn is virtually the only artery connecting our community with all areas to the north and west.
 - Street A and the Legion Rd extension would not divert traffic from Park Lawn north of Street A.
- The City can always reduce the lanes of traffic in the future. However, if the lanes are reduced to two, it will likely be impossible to ever increase them back to four.

Construct Street A as a four-lane road, or at least reserve space so that it can be a four-lane road if needed in the future.

- Unless space is at least reserved for four-lanes, it will likely be impossible to ever increase the road to four lanes if needed.
- At busy times, vehicles may block a lane in each direction dropping off and picking up people at the GO Station, even though there will be a drop-off zone on the south side.

Restrict / deter bypass traffic from the Gardiner Expressway eastbound by restricting traffic from the off ramp at Legion Rd. in the peak AM period.

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- Adjust timing for the Traffic lights at Legion Rd. and the offramp in the morning peak period.
- Install a sign warning drivers that the timing of the traffic lights at Legion Rd. are designed to restrict through traffic at specified times.
- It is better to have additional congestion on the offramp rather than in our community.

We hope the City of Toronto will review the traffic plans for our community, take a long-term view, recognize reasonably possible development that will affect traffic in our area, and better aligning the plans with the objectives and needs as seen by our community.

On behalf of the HBSCA Condominium Representatives,

Jim Reekie
HBSCA President

APPENDIX A - QUESTIONS RELATED TO FUTURE TRAFFIC ESTIMATES

A.1 ADJUSTMENTS FOR DEVELOPMENT THAT EXCEEDS WHAT IS CURRENTLY PLANNED OR PERMITTED

Actual development frequently exceeds previously planned / permitted density by a significant amount.

In 1998, Mr. Michael McCart, a city planner, stated the following with regards to HBS south of Lake Shore Blvd: "...urban-design guidelines would be strictly enforced - buildings will be a maximum of 17 storeys and will step down from Lake Shore Boulevard with park-edge buildings no higher than six storeys. It will create very attractive and usable human scale space... We want the buildings to relate to the small-village atmosphere along the park edge instead of it being dominated by towering buildings." (The Globe and Mail, June 15th, 1998). Needless to say, actual development over the last 25 years has significantly exceeded what was planned.

Two more recent examples are as follows:

- The ESSO site at Marine Parade Drive (west end) and Lakeshore Blvd is currently zoned for 1,200 sq. metres of commercial space in a building no higher than 45 metres. The developer is asking for a 59-story building with a height of 159 metres that would include 650 units and gross floor area of 45,000 sq. metres. It is expected that the developer will get most of what it wants.
- The BA Group reports assumed the Mimico-Judson area would have 1,686 residential units. However, after a successful appeal by the developers to what is now the Ontario Land Tribunal, it looks as though the area will have 2.5 to 3 times that number of residential units.

A.2 BA GROUP REPORTS

It appears that the 2020 Report and the 2021 Report, submitted by the developer of the Christie Property, underestimated the traffic associated with HBS and the surrounding area.

- The BA Group reports only considered "existing populations, as well as the planned site development and other planned developments in the area" (2019 Report, Volume 2: Technical Study, pg. 94)
 - Plans have changed (e.g., the ESSO site, XYZ Storage site, and Mimico Judson area) and, especially in the surrounding area, will likely change further to permit densities considerably higher than currently planned or permitted (e.g., Sobey's Plaza and Lake Shore Blvd down to Lake Crescent)

- In addressing traffic in the “Local Area”, it appears that the reports do not consider traffic associated with the area between The Queensway and the Gardiner, from Mimico Creek to the Humber River, even though this area is part of the Local area (e.g., 2019 Report, Volume 2: Technical Study, Figure 36B)
- It appears that the BA Group reports have underestimated residential units in HBS east of Mimico Creek excluding the Christie Property, and the associated traffic, by about 2,000 units or 17%.
 - With two-way AM peak hour traffic of 1,355 for the adjacent area (2019 Report, Volume 2: Technical Study, pg. 164) and 980 for the residential units on the Christie Property, assuming a constant ratio of two-way traffic to units, and the Christie Property having 7,455 residential units; this implies about 10,310 residential units in the remainder of HBS east of Mimico Creek.
 - Our estimate of units in the HBS east of Mimico Creek, excluding the Christie Property, is about 12,400 residential units.
 - It should be noted that the east part of HBS is still within the area that the BA Group has described as the “Local Area”

A.3 TMP ESTIMATE OF TRAFFIC FROM THE CHRISTIE PROPERTY

There is a question as to whether the TMP underestimated the traffic from the Christie Property by starting with a lower number than generated by the BA Group and then double counting for the mode shift away from the automobile.

- There is a question as to whether the TMP underestimated the unreduced traffic associated with the Christie Property. For example:
 - The BA Group assumed outbound “auto traffic” in the AM peak hour of 875 (2021 Report pg. 55, Table 23) while the TMP assumed 751 before reduction for mode shift. etc. (TMP, Appendix G4, Section 2.5.2)
 - This represents a potential 17% reduction in outbound traffic in the AM peak hour.
- It appears that the TMP double counted the estimated mode shift away from the automobile.
 - In the TMP, the traffic associated with the Christie Property was reduced by 40% to account for mode shift, etc.

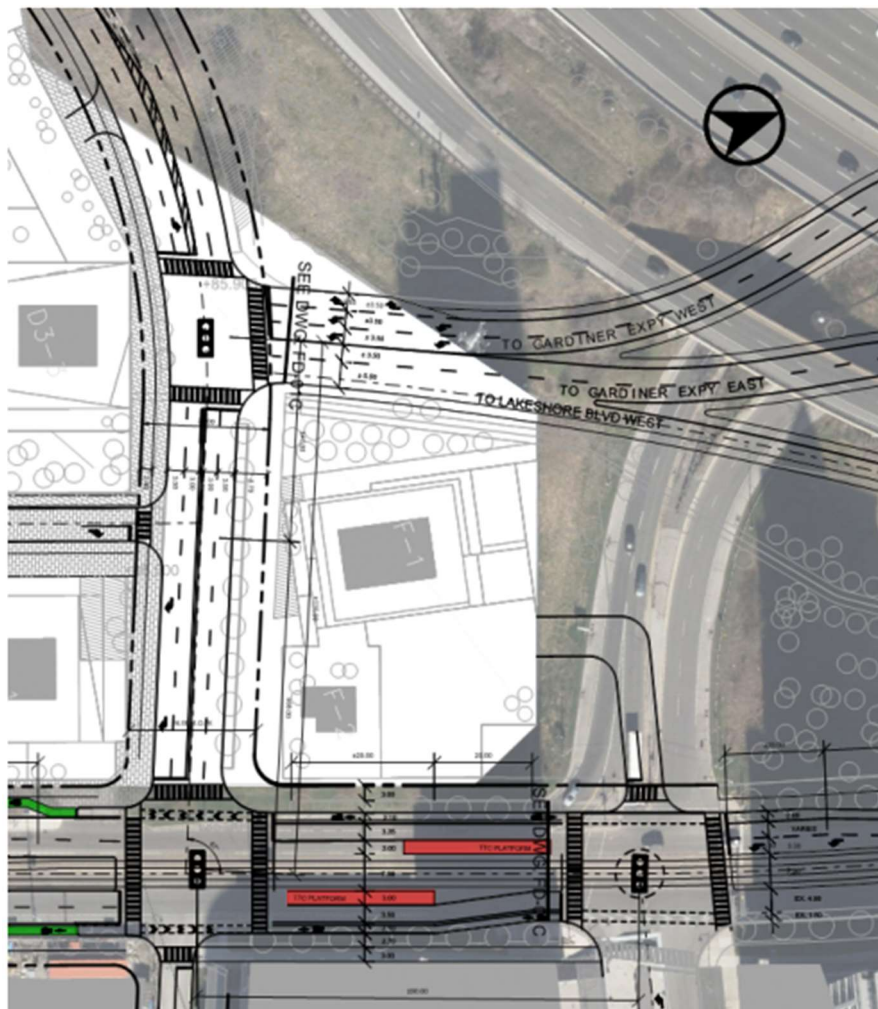
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- The traffic estimates in the BA Group reports already assumed a significant mode shift. For example, the reports assumed that the “auto driver” traffic would represent 25% of the total residential trips (calculated from Table 50 on page 152 of the 2019 Report, Volume 2: Technical Study).

APPENDIX B - GARDINER RAMPS CONNECTED TO STREET A

The figure below is taken from the 2020 Report (pg. 76). It shows how the Gardiner ramps (including Lake Shore Blvd westbound from the east side of the Humber River) could connect to Street A.

It also shows a new connection to the Gardiner Expressway eastbound offramp to Lake Shore Blvd eastbound; however, it appears that serious consideration has not been given to this connection.



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The following is a street view from Google Maps showing the space available for reconfiguring the Gardiner ramps without affecting the Gardiner Expressway as it currently exists.



APPENDIX C – TMP PREFERRED OPTION – 4B

The following describes the TMP’s preferred Option – 4B (TMP pg. 134).

Exhibit 10-6: Transportation Network Alternative 4B – Neighbourhood Main Streets with Four-Lane Lake Shore Boulevard West



Source: June 18, 2021 Staff Report, pg. 37