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CRITIQUE OF PARKING INFORMATION RELATED TO THE PROPOSED CENTRAL TECH SPORTS DOME WHICH HAS BEEN PROVIDED BY THE TORONTO DISTRICT SCHOOL BOARD (TDSB), RAZOR MANAGEMENT INCORPORATED, AND (CONSULTANTS) IBI GROUP

prepared by Wendy Smith

Harbord Village Residents' Association (HVRA)

v. December 22, 2014

We respectfully submit that the sports dome facility proposed by RAZOR MANAGEMENT for the Central Tech playing field would bring a flood of vehicles — carrying athletes, coaches and supporters — into our already traffic-challenged downtown neighbourhood.

In our experience, the "solutions" proposed by the dome proponents would do little to eliminate the inevitable increased parking pressure on our side streets, resulting in the displacement of the neighbourhood's street-parking permit holders.

This will result in unmanageable traffic and parking challenges in our neighbourhood.

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Background

The Harbord Village Residents' Association is a volunteer organization of residents committed to strengthening and preserving the stability, distinctive character and quality of life of our neighbourhood. Harbord Village includes the Toronto area bordered on the north and south by Bloor and College Streets, and east and west by Spadina Avenue and Bathurst Street. Central Technical School is located at the western boundary of our neighbourhood.

The TDSB and sports dome developer RAZOR MANAGEMENT claim that there are adequate parking options to meet all parking demand that might arise at the proposed sports dome on the Central Tech playing field — and that all parking and traffic concerns are resolved.

They rely on documents prepared by parking consultant IBI Group: first, a study dated January 2014;¹ and, second, an *Addendum* (March, 2014),² which revised some conclusions of the original study over the course of the winter 2014 "Working Group" process. The Introduction to the *Addendum* states:

"In January 2014, IBI Group prepared a traffic and parking study for the proposed development of the sports field at Central Technical School in Toronto, Ontario. This addendum was prepared to respond to comments and concerns from City of Toronto Staff."

HVRA disagrees with many of the assumptions, study procedures, and conclusions of these two documents. The *Addendum* corrected one serious error (related to available street parking) and bumped up its "worst-case scenario" from 66 to 99 cars an hour — but it left most other issues unresolved.

Nor does HVRA believe that the "contingency plan" produced by IBI at the request of city staff would solve parking overflow needs. We argue that the various "mitigation measures" proposed in this plan would be ineffective, as is explained further in this critique.

¹ [Central Technical School Sports Field Development Review of Traffic and Parking Impacts. Final Report.](#) Prepared for Toronto District School Board by IBI Group, January 2014.

² [Addendum to Central Technical School Field Traffic and Parking Study.](#)

To: Matthew Raizenne [RAZOR MANAGEMENT], March 13, 2014.

The two IBI documents are also available on (former) Ward 10 Trustee Glassco's TDSB webpage: <http://www.tdsb.on.ca/ward10/Ward10/CentralTechChampionshipField.aspx>

I. Issues arising from the two IBI Group reports

First, IBI's study of parking availability in the Central Tech parking lot is based on faulty sampling, and did not actually examine parking availability on the school lot when night school was in session.

IBI's parking occupancy surveys were conducted from Monday, December 2 to Sunday, December 15, 2013. Of the 17 "observations" recorded, seven were on weekends, two were during a school day, and eight were on weekday evenings.

IBI, relying on information from the school principal, reported there were night school classes underway during the period that the surveys were taken.³

In fact, as the Fall 2013 *Learn4Life* night school calendar⁴ shows, the 11-week night school term started on Saturday, September 14 and thus would have ended by the week of the 25th of November, with perhaps a few classes making up for a Thanksgiving closure by finishing on Monday December 2.

Therefore, only the cars recorded in the school's Borden Street parking lot on the first evening surveyed (Monday December 2) might have belonged to night school students. However, that sample on Monday, December 2, was taken at 6:30 PM, despite the fact that a quick look through the night school calendar will show that more than a dozen of the Central Tech night classes didn't start until later in the evening (including three on Mondays).

Further, although the IBI study reports the dates and times of its 17 observations, it does not report the actual parking space counts for these various observations. Instead it produces "averages", resulting in a very foggy

³ [Central Tech Working Group – Proposed Sports Dome. City Staff Issues](#), February 24, 2014. (TDSB, Razor Management, and IBI Group.) Responses to City Staff Issues: Parking and Traffic, page 1. "IBI: Yes there was night school taking place the days the survey took place. Based on discussing with the Principal of Central Tech the gyms and pool were also being permitted out the days the survey took place." Most of the information included in this question-and-answer document was incorporated into the IBI *Addendum* and so is not reviewed here.

⁴ *Learn4Life, Fall 2013: Continuing Education , Daytime and Evening General Interest classes for adults*: <http://www.tdsb.on.ca/Portals/0/AdultLearners/docs/L4Lfallwebfinal.pdf>. e.g. Mondays (2013): Sept 16/23/30 Oct7/14/21/28 Nov4/11/18/25 = 11 weeks.

picture indeed of actual parking availability during different days and times of days.

Second, the January 2014 report identified a "worst-case scenario" of 66 cars an hour. At City staff insistence, in its March Addendum, IBI bumped its worst-case scenario from 66 to 99 cars per hour.

We consider the city's estimate of dome-related traffic at 99 cars an hour to be low, but accept it for discussion purposes. We have rounded the number up to 100 cars an hour to simplify the following calculations:

The maximum capacity on each of four mini-fields is 30 players, or 120 players in total. Plus coaches, family, other supporters, and Razor Management staff. Estimate 100 cars an hour.

DURING THE SCHOOL YEAR

600-700 cars each school day X 5/week (M-F) = 3,000-3,500 cars
plus
1,700 cars on Saturdays (100 cars/hour X 17 hours)
1,700 cars on Sundays
= 6,400-6,900 cars per week during the school year

DURING SUMMER HOLIDAYS

1,700 cars per day X 7 days
= 11,900 cars per week when school is not in session

The above estimates are based on the following schedule of the **Licensee's Hours of Access** (the hours that Razor Management would have control of the Central Tech playing field). These hours were provided in the TDSB committee report which led to the school board's approval of the Razor Management proposal:⁵

- x from 6:00 PM to midnight, from September 1 to October 30
(6 hours a day in the autumn);

⁵ Source: *Licensee's Hours of Access*, [Central Technical School Championship Field Redevelopment: TDSB Planning & Priorities Committee, June 12, 2013](#), (page 32).

Note that these hours of access mean that Razor Management would control the Central Tech playing field for 12 months of the year, except during school day hours, for 21+ years. (In fact, runners/customers would be able to use the running track even during the school day. See the following page for more about this.)

- x from 5:00 PM to midnight from November 1 to April 30
(7 hours a day during the winter); and
- x from 6:00 PM to midnight from May 1 to June 30
(6 hours a day in the spring).
- x All non-operating school days, weekends, public holidays and summer holidays will be from 7:00 AM to 12:00 AM
(17 hours a day during weekends, public holidays and summer holidays).

We should note that the above estimates of dome visitors and traffic assume maximum use of the facility during all the hours under Razor Management's control. This certainly reflects the company's business plan, and is critical to its financial success. Razor's success at attracting customers to its smaller dome at Monarch Park, estimated to serve 10,000 users a week,⁶ suggests it would quickly attract even larger streams of users (and traffic) to the downtown Central Tech site.

We should also note that players will overlap one another's time slots. Players normally arrive ahead of their game time to prepare, and will likely linger after their games end to debrief, pack up equipment, and re-dress. Such activity can take up to half an hour, as any parent experienced in ferrying children to and from sports activities will attest.

The result of such overlaps means (as an example) that drivers arriving with soccer players for the 8:00-10:00 PM slot will find parking spaces still occupied by those still wrapping up from their 6:00-8:00 PM slot. (That is to say, some of the 99 drivers from the 6-8 slot will still be parked when the 99 drivers arrive with players for the 8-10 slot, meaning an overlap demand for up to 198 parking spaces.) Rescheduling some sessions to start on the half-hour, as IBI eventually proposed in its *Addendum*, would only partially address this problem.

We should also note that there will be unknown numbers of runners on the running track, all day long. These additional facility customers are not included in our calculations of parking demand.

⁶ [Decision of the Ontario Divisional Court, September 30, 2014](#), page 7:

"Indeed, the evidence shows that the Monarch Park facility, which is somewhat smaller than the [Central Tech] facility proposed here, has 10,000 users a week."

The following is an excerpt from **Monarch Park Stadium Indoor Track Memberships**,⁷ a brochure distributed online by Razor Management. It seems likely that similar rules might apply to the company's Central Tech dome.

Membership Entitlements & Obligations

Members are permitted to run as often as they would like during Facility Hours.

(M→F 6:30am - 12:00am; Sa-Su→7:00am – 11:00pm)
as long as their membership is in good standing.

Monarch Park Collegiate school time is between
7:00am – 5:00pm Monday to Friday.

Track may not be available on occasion during this time.

As a side note, these advertised running track hours do not reflect the terms of the TDSB/Razor Management licence agreement.⁸ This agreement, dated December 1, 2011, limited Razor customers' access to the field and track only after 5:00 PM during the season when the dome was up, and after 6:00 PM on other school days. The advertised schedule above expands use by adult customers to the track throughout the entire day, on most days. This seems rather odd to us, and raises security concerns that would not arise had the licence agreement been followed.

Third, IBI changed its assessment of available side-street parking around the school after comments from city staff.

According to IBI's initial January 2014 report:

...The on-street spaces on the neighbourhood streets are all permit-only between midnight and 7 a.m. with some streets being restricted to one hour only between 8 a.m. to 6 p.m. to restrict long-term parking during school hours.

⁷ Source: **Monarch Park Stadium Indoor Track Memberships**
<http://www.monarchparkstadium.com/assets/track-membership-details2.pdf>
(accessed Nov. 20, 2014) via <http://www.monarchparkstadium.com/facility-rates.html>)

⁸ **LICENCE AGREEMENT Between TORONTO DISTRICT SCHOOL BOARD (the "Licensor") and RAZOR MANAGEMENT INC. (the "Licensee") Monarch Park Collegiate Institute Playfield (December 1, 2011).**
See: (8.4) Licensee House of Use, p.20.

Based on the parking restrictions outlined above, most of the on-street parking supply surveyed is available to those accessing the subject site during the hours of operation. In addition to the on-street parking supply surveyed, there is an extensive network of streets in the area within 500 metres of the subject site, most of which also provide additional on-street parking spaces.

However, during the subsequent Working Group meetings, City Transportation staff reported that parking on the neighbourhood streets closest to the dome — in the area between Bloor, Major, Ulster and Palmerston — was already at capacity in that zone. Of 301 possible permit parking spaces, 267 were taken, leaving 34 for visitors, trades, health workers, relatives, and the patrons of our local businesses.

In its *Addendum* of March 2014, IBI then revised its initial analysis, eliminating side-street parking as an option:

"The residential streets surveyed were all found to have relatively high occupancy levels of on-street parking and it is not recommended that this parking supply be depended on to meet the needs of the proposed development."

(*Addendum*, page 4)

and, further on the same page:

"During peak times, approx. 90% of residential parking is occupied."

Actually, residents' experience suggests that during peak times close to 100% of street parking is occupied in much of that zone.

Street parking permit holders arriving home after 6:00 PM on Borden Street, for example, have faint hope of finding an open street space near their home, and often settle for parking a block or several blocks away. Some go out at bedtime to check whether departing restaurant guests have left an available street space, and then move their vehicle into the opened space.

Fourth, the IBI study counted paid parking spots on Harbord and Bathurst Streets as available for dome visitors. Since that time there have been two developments:

(1) there is no parking on Bathurst Street during "rush hour", which has been extended to 7 p.m.; and

(2) half of the paid parking spaces on Harbord Street have just been eliminated as part of the city's bike lane upgrade program. This loss of Harbord Street parking will create even more parking pressures in the neighbourhood during the evenings, especially as guests arrive for dinner at Harbord Street's many popular restaurants.

Fifth, no traffic study was done in relation to this report. Therefore, IBI's conclusion (page 9) that dome-related traffic would not cause problems in the neighbourhood is without foundation.

In fact, Harbord Street is a heavily used route to and from the downtown core. It contains two busy bike lanes. We challenge the conclusion that an additional 99 cars an hour crossing Harbord onto Borden Street, an interior neighbourhood roadway, would not be problematic.

There would also be traffic impacts on Bathurst Street, as south-bound drivers crossed traffic to turn east onto Harbord.

II. Mitigation measures envisioned by IBI Group

In its *Addendum* IBI presents a series of "Proposed Mitigation Measures" such as staggered scheduling, restrictions of rentals to adults only, or a set combination of adult and child usage. These might adjust the timing of traffic flow, but we do not believe that they can result in any reduction of parking demand. Clearly such "adjustments" have not been thought through in terms of children's needs, or costed for likely demand.

The following is a review of each of the "mitigation measures" which were discussed in the *Addendum* (page 5).

1. [RAZOR MANAGEMENT] will program two fields on the hour and two fields on the half hour. This will reduce parking demand due to overlap, reducing the overall peak demand from 99 to approximately 83 spaces.

Our comment: We do not understand the logic here. While staggering start-times by the half hour might reduce the number of cars arriving at specific times, this would not significantly reduce actual parking demand.

2. Additional parking supply at nearby TDSB schools King Edward School (22 spaces 300m away) and Harbord Collegiate (46 spaces, 600m away) will be made available to users of the proposed development. These 68 spaces on TDSB property will be used in the event that any overflow parking is required.

Our comment: There has been no parking study conducted on these two lots to ascertain whether the spaces identified would actually be available. It is our understanding that neighbours sometimes rely on school lots for evening/overnight parking when no street parking is available.

We are also very skeptical that dome customers would actually be willing to make their way to either of these alternative school lots, which require a rambling route through the neighbourhood's one-way traffic mazes (and then a walk of several minutes to get back to the dome, including navigating a cross-walk in one case and at least two streetlights in another).

Inevitably, they would seek instead to use street parking spaces, meaning that neighbourhood permit holders would be displaced from street parking until after the facility closes at midnight.

Problems related to these two alternative school lots are addressed more fully below in the section "The Harbord Village Traffic Mazes".

3. The TDSB will work with City of Toronto Parking Enforcement beginning in May 2014 to begin tagging and towing cars that are illegally parking in the on-site parking lot overnight. This would eliminate approximately 20-40 vehicles currently using the site outside of school hours.

Our comment: As happens throughout the city, neighbourhood residents sometimes park in school parking lots evenings and overnight when they cannot find an open side street space. In Harbord Village, the school lots are also sometimes used after school hours by visitors to nearby homes and by the guests of restaurants and pubs on Bloor, Harbord, and College Streets. These various drivers, using the school lots without permission (although rarely with any complaint from the TDSB), are now being portrayed by the TDSB and IBI as scofflaws, who must be blocked from the lots so some customers can park there.

While TDSB has every right to remove these unauthorized drivers from the school's parking lot, the consequence for us in Harbord Village will be — inevitably — a chain reaction, sending these drivers around and around our traffic maze, looking for a street space. And, once again, displaced neighbourhood parking permit holders will be forced to search for spaces further and further from their homes.

4. The TDSB will consider partnering with the Toronto Parking Authority to convert the existing on-site lot to a paid parking lot to better regulate unauthorised on-site parking.

Our comment: Please see our comments to #3 just above regarding the consequences of blocking unauthorized parking on school lots.

We would also note that converting the school lot to paid parking will also increase some visitors' motivation for seeking unpaid side street parking — and displacing neighbourhood parking permit holders.

5. The facility can be permitted to allow only adult sports. This would drastically reduce the amount of vehicles driving to the school as adult users are more likely to carpool or use alternate modes of transportation than children are.

Our comment: The plan to turn the Central Tech playing field over to dome developer RAZOR MANAGEMENT is being promoted by TDSB as somehow of "educational" value, and therefore a benefit to children.⁹ However, this suggestion that the facility could be restricted to adult athletes (presumably after school hours) is certainly not prioritizing children's needs — although it does highlight the reality of the dome as a commercial enterprise.

We are also sceptical of the suggestion that restricting the facility to adult customers only would somehow result in fewer customers arriving by car.

6. As a last resort, the TDSB could consider moving existing night school classes to another nearby school. The TDSB recognizes that this is not a desirable solution and would only be considered under extreme circumstances.

Our comment: Eliminating Central Tech's night school program to benefit the commercial dome operation is an outrageous suggestion. Central Tech's night school program is a beloved city institution offering classes to Torontonians seeking training with the school's specialized facilities and equipment. Many of these opportunities would likely not be available at other nearby schools.

⁹ In any case, the Ontario Divisional Court did not accept the idea that the primary purpose of the RAZOR MANAGEMENT dome activities would be educational. [Note the following statement from the decision of the Divisional Court justices, September 30, 2014](#) (page 6):

"When one looks at the application filed by [RAZOR MANAGEMENT] and the information provided respecting the similar operation of an inflatable dome at Monarch Park Collegiate, it is evident that the proposed activities are not "only" for teaching or instructional purposes. It is true that there may be an instructional component to children's sports such as soccer. However, one cannot characterize the adult soccer and frisbee leagues as having an instructional purpose. Nor does individual payment for use of the track suggest there is any instructional component. Rather, much of RMI's proposed use is for private recreational activities."

IBI's *Addendum* also notes that as a part of the proposed development:

(a) improved bicycle facilities will be built on site (25 new bike rack spaces);
and

(b) **non-automobile modes will be promoted to all users of the facility.**

Our comments:

(a) More bike racks are always a good thing; and

(b) It is unreasonable to think that dome management will succeed in persuading significant numbers of dome visitors away from their usual forms of travel. ***Drivers will drive*** — especially when carrying sports equipment and shepherding children to and from sports activities.

III. The Harbord Village traffic mazes (and the rambling routes to alternative school parking lots)

Side street parking is not an option — at least, the TDSB and RAZOR MANAGEMENT have conceded it is not **supposed** to be.

However, HVRA is sceptical that dome visitors would resist the temptation to occupy any space available close to the dome.

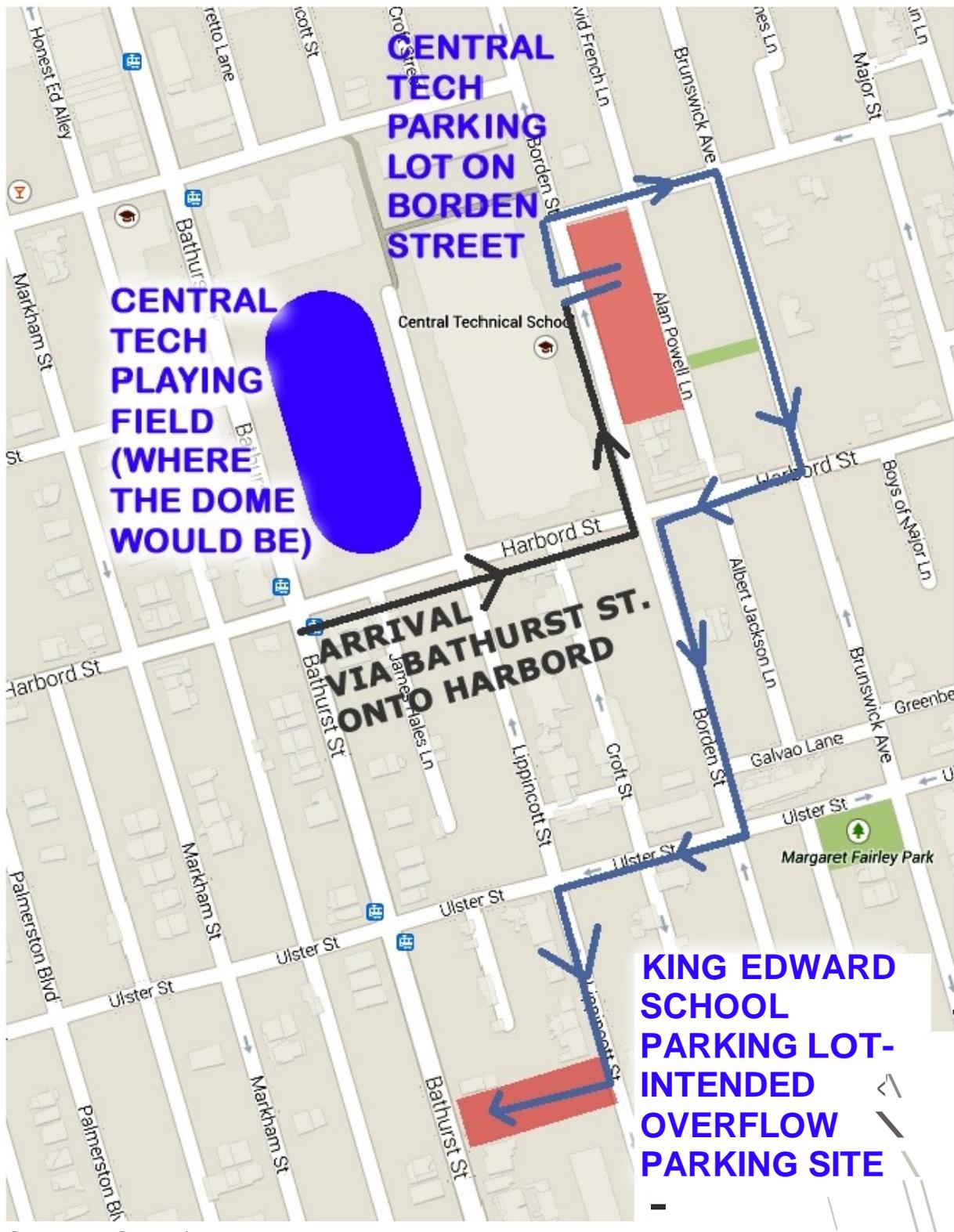
We also find it unlikely that they would use the alternative overflow parking options, as designated by the TDSB for dome customers, at King Edward and Harbord Collegiate Schools. This idea does not recognize the challenges visitors face when driving through our neighbourhood.

Anyone unable to find a space at the Central Tech parking lot on Borden Street would be forced into our neighbourhood traffic mazes to get to the other schools.

Once parked at one of these two school lots, they would then have to walk several blocks back to Central Tech, perhaps arriving back at the dome late for their game. In the winter they will be walking back to their car through the snow and ice, carrying sports equipment, often with snow-suited kids in tow.

If you were a parent trying to get your child on time to an event at the Central Tech dome, and the school parking lot was full, here's what the TDSB would have you do:

THE MOST DIRECT ROUTE TO THE KING EDWARD SCHOOL PARKING LOT



Source: Goog/e Map, annotated.

The map on the page above shows Central Technical School and surrounding roads. Note the one-way arrows on all the neighbourhood streets. This traffic maze in Harbord Village is designed to slow drivers down and discourage traffic through our side streets. If you're not from around here it's tricky finding your way around in a car.

The black arrows assume your arrival from Bathurst Street, and east onto Harbord. You turn left (north) onto Borden, enter the Central Tech parking lot, find it is full, exit by the same narrow entrance, continue north on Borden, turn right (east) onto Sussex, right (south) onto Brunswick, west onto Harbord, south onto Borden, east onto Ulster, south onto Lippincott, and into the 22-space King Edward School lot. Providing it's not full.

THE SECOND ROUTE TO THE KING EDWARD SCHOOL PARKING LOT

There's a second route to King Edward School, just as complicated, where you continue west on Harbord, south onto Bathurst (a challenging turn, especially during the crazy rush-hour traffic), east on Ulster, and south onto Lippincott.

GOOGLE MAPS estimate it is a seven-minute walk from King Edward School back to the Central Tech dome (and the game your kid is now late for).

THE ROUTES TO THE UNDERGROUND PARKING GARAGE AT HARBORD COLLEGIATE SCHOOL

The TDSB has designated Harbord Collegiate School as a second overflow parking site for dome customers. The map on the following page shows the two most direct driving routes to this location. The black arrows assume your arrival from Bathurst Street, and east onto Harbord. You turn left (north) onto Borden, enter the Central Tech parking lot, find it is full, exit by the same narrow entrance, continue north on Borden, and then you have two choices.

The first route, indicated by the blue line on the map, starts with a right turn (east) onto Sussex, then right again (south) onto Brunswick, and right (west) onto Harbord, continuing west until Euclid Avenue, where you turn right (north) onto Euclid (a one-way street) and then left into the 68-space parking garage.

The second route, indicated by the brown line on the map, continues north from the Central Tech lot via Borden, with a left (west) turn onto Lennox Street, then left (south) onto Palmerston Blvd., right (west) onto Harbord for

two blocks, then right (north) onto Euclid and then left into the parking garage.

Google Maps estimate an 8 minute walk back to the Central Tech dome from this location. Given the traffic light to be crossed at Bathurst Street, the walk would likely be longer.



Source: Google Map, annotated.

IV. Photos of the Central Tech Borden Street parking lot during night school season

During the week of September 29, 2014, local residents went out around 7 PM to check on available spaces on the Central Tech parking lot on Borden Street. They found this:

Monday, September 29, 2014



Tuesday, September 30, 2014



Wednesday, October 1, 2014



Thursday, October 2, 2014



In conclusion

The traffic and parking burdens that would follow the establishment of a commercial sports dome on the Central Tech playing field would have an unacceptably negative impact on our neighbourhood.