

An Open Response from the Concord West Community To the Open Letter from Concord Storage

The present communication by the Concord West community is written in response to Andy Santoluce's "Open Letter from Concord Storage to the Steering Committee Participants", dated January 3rd, 2013, whose main thrust is contained in a sentence on p. 10: "I believe that the south side of Avenue Seven east of the tracks should have equitable density parity with the north side parcel east of the tracks."

The purpose of Mr. Santoluce's Letter is to convince his audience that in the Secondary Plan for the Concord GO Centre, his Concord Storage property, which is located precisely south of Highway #7 and east of the tracks, should (1) not be designated to serve as a parking lot supporting the transit hub, and (2) be designated for high-density development. As Mr. Santoluce has made clear in Steering Committee meetings, where he chose to be more forthcoming than in his 11-page "Open Letter", if his property were to be designated as future transit-related parking, he would face expropriation; whereas if his property was designated for residential and commercial development, he could sell it for a price commensurate with the planned density of this development.

In his Letter, Mr. Santoluce takes a two-pronged tack, proceeding on both prongs by the use of cunningly collaged references to urbanistic literature of questionable relevance. He devotes the major part of the Letter to arguing that the Concord GO Centre transit hub should have "no automobile parking, period" - which, by simple though unarticulated logic, should lead the reader to conclude that, in particular, the hub should have no automobile parking on Mr. Santoluce's property. The second part of the letter shows Mr. Santoluce as a particular friend of the transit authorities, urging high-density development all around the planned Concord GO transit hub (and in particular, by another dint of unarticulated logic, on Mr. Santoluce's property) by pointing out, again in formal style and with supporting quotes from City directives and from urbanist research, that the more people you glob together near a transit station the more transit riders you will get.

While Mr. Santoloco's Letter is designed to impress planners and Provincial authorities, it cannot hide an expressly contemptuous attitude towards the Concord West community, to which he refers disparagingly and incorrectly as "the Baldwin enclave" (though half of it is neither adjacent to nor even reachable via Baldwin), whose size he understates by a factor of 2.5, and whose struggle for survival he blithely dismisses in the high-density part of the Letter by asserting that "self-selection will cure [the community's] perceived ills".

While we have absolutely nothing against Mr. Santoloco maximizing as best he can the profit from his land, his proposals are short-sighted and potentially detrimental to the natural and social environments of the Concord West community. In what follows, we address some of the Letter's highlights.

1. The "No Parking, Period" thesis

Mr. Santoloco's argument can be summarized as follows.

First, he presents a set of statistics (taken from a study by Angela Brinklow) from three communities located along California's Bart System, two of which (Hayward and Fremont) offer station-area parking, while the third (Berkeley) has "no parking, period". The statistics quoted include the percentage of inhabitants of each community that ride the Bart to work (7.9%, 7% and 17.4% for Hayward, Fremont and Berkeley, respectively) and the percentage of riders within each community that access the station by foot or bike (13%, 8% and 59%, respectively).

If one probes Mr. Santoloco's text, it is actually not clear what role – other than of window-dressing – these statistics play in his argument. Mr. Santoloco misstates the meaning of the first statistic, the ridership percentages, by claiming them to show that the "no parking, period" policy is "not detrimental to transit ridership in certain circumstances", and then adds, apodictically and with no elucidation, that the Concord GO Centre "reflects one of those circumstances". Not only is that last assertion completely spurious, but the data show no such thing: the fact that a station does or does not provide parking would mostly affect its use by those **outside** the community, not its use by the locals who can reach the station by foot or bike – and the Brinklow study does **not** provide any relevant data about **outside ridership**. The differences in local to-work

ridership would have to do with issues such as the location of people's work, i.e. what percentage of the locals work outside the given community but in a place easily accessible by Bart - and certainly not with the availability of local station-area parking. Moreover, in order to support gratuitous twist of Mr. Santoloco's argument, the study would have to deal in counterfactuals such as "what would be the effect on the overall ridership if Berkeley did provide station-area parking or Fremont did not?" Ah, for a Ministry of Counterfactual Statistics!...

As for Berkeley's 59% by-foot-or-bike statistic, Mr. Santoloco uses it as a jump-off point (and we do mean "jump"; the connection is nonexistent) to a vision of a "pedestrian-friendly" environment that would ensue if the Concord GO hub had no parking, and he suggests that this would be just what the Concord West community is clamoring for (more about this below). One is compelled to wonder, however, (though Mr. Santoloco doesn't) how the remaining 41% of the passengers arrive at the Berkeley station. Maybe they take a bus or a taxi. But, if some percentage of them do insist on driving to the station, then they must be parking somewhere – and the "somewhere" would have to be in the streets or retail-parking lots around the station. One has to seriously question whether such a scenario would enhance the pedestrian-friendliness of the Concord GO neighborhood - more likely, it would create yet another major headache, and **ultimately force the City to retrofit the hub with a parking lot at some later date**, when doing it properly will be more difficult than if it was planned-upon from the outset.

But no, says Mr. Santoloco: nobody from outside the Concord GO neighborhood will, now or in the future, insist on using the Concord GO hub. Here he really puts on a planner's hat, invoking projected future population densities in outlying areas, banking on things that will "mostly" take place, modeling the theoretical behaviour of potential (but invariably uninterested) outside riders, and quoting from guideline 10d of... the City of San Diego (California, here we go again!). Does all this warrant the confidence that Mr. Santoloco exudes when he enthusiastically urges upon his readers the slogan 'No Parking, Period'? We are sorry to say: it does not. For example, he argues that since the intention of the transit authorities is to draw ridership to the Concord GO from the north and west of the transit corridor, but those riders are much more likely to use other transit stations,

there is no need for the Concord GO hub to accommodate arrivals by car. But be that as it may, isn't it conceivable - whatever the intention of the authorities - that there will be people east or south of our hub who will find it convenient to use the hub, and will drive to it?

On our part, we would suggest that since the future of the neighboring areas and the future needs of their inhabitants are insufficiently knowable to make the kind of cavalier pronouncements that Mr. Santoluce offers, the prudent course of action would definitely be to equip the hub with parking - preferably multi-level, so as to minimize its footprint. And if the Concord GO Centre and its immediate vicinity become as vibrant a commercial center as we have heard it described, the parking (even if it were underused by hub riders) will not go to waste.

But what, then, happens to the "pedestrian-friendly interface" that Mr. Santoluce is eager to bestow, as a generous gift, to what he condescendingly calls "the peripatetic Baldwin enclave"? We will turn to this next. But before doing so, we would like to remark that these abstruse comparisons of Concord West with cities in California, etc, that planners keep bringing up are totally out of order. If nothing else, the climate restrictions alone preclude them – and if it is impossible for our residents to walk in snow-covered or ice-covered sidewalks, what to say of biking in the same conditions?

2. The Gordian red herring

First, let's get Concord West's parameters right. Concord West is the residential area east of Keele, south of Highway 7, west of the CN line, and north of Jardin. It encompasses 387 households, which - counting 2.5 persons per household - translates into a population of over 1000 (8% - 17% of the projected population of Rose Garden City) .

Concord West was originally founded by Anglo-Saxon families from Concord, Massachusetts, and subsequently peopled with European emigrants from Italy, Germany, Slovenia, etc. Many of the Concord West families have lived here – in the same houses – for up to seven decades. The old-time residents acquired their piece of ground and their house through hard physical labor – as metal-workers, stone-workers, miners, etc. Many of them use their plots of land to grow their own fruits and vegetables, use the wood of

their own trees to supplement the heating of the house, do their own house-repairs and house-improvements, and employ whatever skills they have to maintain their equipment in working order for as long as possible. In other words, their way of life is what would properly be called *sustainable* before the term got hijacked by development consortia, SmartCentres, and other big commercial interests - whose brand-new usage of the term is echoed in Mr. Santoluce's enthusiasm for "new houses replacing older stock" (which he quotes as proof of all-being-well in Concord West).

In his Letter , Mr. Santoluce pretends that his "no parking, period" proposal helps solve a problem particularly pertinent to Concord West, but the problem that it purports to solve is actually a red herring. It starts out by being presented as a clash between, on the one hand, "the existing community's idea of place", its "desire for a pedestrian-friendly environment", its "need to reconnect with the Bartley Smith Parkway trail system" and, on the other, the Province's plan to build a parking lot for the transit hub. But since this particular clash would obviously not give Mr. Santoluce the required argument against **all** parking associated with the hub, he performs a little sleight-of-text and abruptly, in the same breath, morphs this insufficiently milkable clash into a clash between the building of the proposed multi-modal transit hub, and the need "to ameliorate the [ensuing] knot of traffic congestion and potential traffic gridlock", the resolution of which is, in Mr. Santoluce's words, a "legitimate concern of the Baldwin community". Either of these clashes, or perhaps their explosive combo, is indistinctly presented by Mr. Santoluce as a "Gordian knot" that he, like the great Alexander, will sever - not with his sword, but "by severing all adjacent park-and-ride lots [yay! **all** of them!] from the future design of the transit hub". And no matter what the exact clash, what Mr. Santoluce is doing he is doing for us, "the existing community", Concord West. That is the extent to which he recognizes that "many of [our] concerns are legitimate and must be addressed"...

But Mr. Santoluce has got his clashes wrong – in other words, his purported clashes are red herrings. Concord West has, with respect to the plans for the Concord GO Centre, two major and simple objections. One, **it does not want the transit hub to be located south of Highway #7**, where it would be destructive of the community's environmental and cultural heritage. Two, it wants the planned inhabitation of Rose

Garden City by 6000-12000 new residents to be conditional upon prior improvements of the road and traffic infrastructures, improvements that would alleviate the present substantial traffic problems and **accommodate the new local traffic associated with this inhabitation.**

Mr Santoluce, unsurprisingly, has no interest in these actual objections, other than distorting them for his own purposes. As for the first one, it is an explicit premise of Mr. Santoluce's argument that the transit hub will be located south of Highway 7, i.e. on the site of the Concord West Greenspace. This assumption is advantageous to him, because it makes his "no parking, period" proposal look as if it was meant to benefit Concord West, rather than Mr. Santoluce himself. He claims, with obvious condescension towards the very community whose Gordian knot he is about to sever, that it shows him to be a "pragmatist, grounded in reality, evaluating previous factual and historical events". By "pragmatism" he means here the position that Provincial decisions pertaining to transportation are, in effect, irreversible acts of despotism ensuring that high density development steamrolls over landscapes, living things, environments and communities, and indifferent to considerations that, in our view, are much more worthy of being designated as "pragmatic" - for example, the present and future quality of life of the Province's inhabitants. We certainly hope that "pragmatism" as Mr. Santoluce understands it - regarding the Province as a de-facto indifferent and arbitrary despotic power - is not the only possible grounded-in-reality position available to Ontario citizens.

As for the second objection, Mr. Santoluce distorts it into a worry, on the part of Concord West, concerning the traffic associated with the influx of car-borne transit riders from outlying areas. But this has never been Concord West's primary concern: instead, its primary concern is **the increase in traffic resulting from the increased population in the neighborhood itself.** Which brings us to our next topic: the TOD.

3. Is "our TOD" a TOD?

In his communication, Mr. Santoluce jumps from a quick ushering-in of the term "Transit-Oriented Development" (TOD) to the unsupported assumption that the Concord GO Centre and its neighborhood constitute an instance of such a thing. In fact, he refers

to it tenderly as "our TOD" - even though, to the best of our knowledge, he doesn't live anywhere near it.

What, then, is a TOD? Angela Brinklow, in the study used by Mr. Santoluce to shore up his "no parking, period" thesis, quotes Peter Calthorpe's definition of a TOD as being a "mixed-use community within an average 2,000-foot [i.e. 600-meter] walking distance of a transit stop and a core commercial area. TODs mix residential, retail, office, open space, and public uses in a walkable environment, making it convenient for residents and employees to travel by transit, bicycle, foot or car" and then adds, in part quoting Nelson & Niles, that: "In addition, the transportation hub should be located in the heart of the neighbourhood, within a 400 metre, or 10 minute walk from residents. This central location reflects the importance of transit in the community and in the region as a whole." Curiously, according to this study, the TOD should be located squarely in the middle of the Rose Garden City development, well north of Highway 7!

Will the Concord GO Centre be a TOD? Well, at present there is no reason to suppose so. As the neighborhood stands now, it has nothing even vaguely resembling a core commercial area. Without a car, getting to a supermarket, a drugstore, a dentist, a school, a community center, a clothing store, a hair salon, an office-supply store, a post office, a cinema, a park, a decent restaurant, a butcher, a hardware store, a hospital - getting to any of these, let alone getting to more than one, tends to be a major, time- and effort-consuming project. In other words, one cannot live in this neighborhood without driving or being driven. As for walking for health and pleasure, the area has no "walkable environment" outside of Concord West and its greenspace - unless one takes pleasure in desolation, ugliness and car exhaust. There is no convenient way to travel to any useful destination by transit, bicycle, or on foot; and even travel by car is frequently a hardship, due to the traffic congestion.

But isn't this all going to change? Perhaps - but as far as we know, nothing at present warrants a positive answer. We have no idea what specific non-residential amenities, if any, are being planned for the Rose Garden City development, and consequently have no reason to believe that its future occupants will be able to use cars less frequently than the neighborhood's present occupants. Moreover, we have no idea where the new residents will work, and no reason to assume that most of them will work

near transit stations and will not, in the final analysis, find driving to work more convenient than taking public transit.

Calling the Rose Garden City development a TOD – as Mr. Santoluce does in order to be able to quote TOD-related literature in support of his theses - does not make it one. And until the Concord West residents have a realistic basis for believing it will be one, they will have to assume that the development will bring with it a substantial increase in internal car traffic. It is this, not Mr. Santoluce's red herring of outside park-and-ride commuters, that constitutes the crux of Concord West's traffic-related concerns.

4. The "Pack them densely" thesis: does transit serve people, or do people serve transit?

The last part of Mr. Santoluce's Letter is dedicated to painting the vision of the Concord GO Centre as a "transit-supportive development", by which he means a development with the highest possible population density (everywhere, and in particular on his land). In support of this vision, he quotes supposedly "unchallengeable research" which shows that the more people you pack in, the more transit riders you'll get. But here is the thing: unless the Concord GO Centre is really going to become a TOD - by virtue of solid planning, rather than just Mr. Santoluce's verbal tricks - arguing for packing people in densely is arguing for disaster. Let's first see exactly where we are heading, before deciding whether we want to head there more and faster. In our book, that's what *planning*, or at least *good planning*, is all about.

5. Closing thoughts

Finally, it is noteworthy that nowhere does Mr. Santoluce's letter actually address the main concerns of our community, as they have been poignantly expressed in public documents addressed to various government bodies. Traffic congestion and parking lots associated with the hub are indeed problems that we have contended with, and which should be addressed in the context of intelligent planning, but they do not address the core of our concerns which relate to the protection of the Bartley-Smith Greenway /Langstaff Ecopark, the Upper West Don river and the environment of the Concord West and Glen Shields communities. The location of the Concord GO hub proposed by the

MTO constitutes a serious threat to the already endangered ecosystem of the greenbelt corridor and river valley, and to the quality of life of the Concord West community, while at the same time being far from optimal for the business and commercial interests which the station is designed to serve. Following the unanimous stance of Vaughan Council in 2010, the MTO's plans for the Concord intermodal transit station must be modified so that its location is **not south** of Highway 7. At the January 30th public meeting regarding the Secondary Plan for the Concord GO station, 4 out of 5 working tables arrived at the same conclusion, and chose a location **north** of Highway 7. This is the simple objective of the struggle of the Concord West community which Mr. Santoluce ignores. And it alone will ensure that, irrespective of the size of the eventual profits made by Mr. Santoluce's with his land, the Concord West greenspace and its ecological niche will be protected, annexed to the Bartley Smith Greenway/Langstaff Ecopark, and direct access of the Concord West and Glen Shields residents will be restored to both the greenspace and the Greenway. This alone will be to the benefit of all Vaughan residents, as well as all Ontarians.

Concord West Ratepayers Association

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