May 27, 2014

To: Councillor Peter Milczyn, Chair, Planning & Growth Management Committee
   Members, Planning & Growth Management Committee

Re: Final Report on Areas for Proposed Residential Apartment Commercial (RAC) Zone

The Greater Toronto Apartment Association represents the owners and property managers of over 150,000 suites of purpose-built multifamily rental housing in the Toronto area. Most of the GTAA Members’ buildings were constructed 40 to 60 years ago, and have been subject to the restrictions and inequity that this new Residential Apartment Commercial (RAC) zoning is attempting to correct.

The current criteria for inclusion into Residential Apartment Commercial (RAC) zoning are:

- Located in a Residential Apartment (RA) zone
- Minimum of 100 suites
- At least 29% of current residents living below the Low Income Cut-Off (LICO)

A previous staff report states,

There is a growing concern that many of Toronto’s apartment neighbourhoods are not able to meet the needs of residents to provide access to the social services or commercial facilities that would potentially make these communities healthier and more vibrant. The new Residential Apartment Commercial zone in the city-wide Zoning By-law addresses this with the inclusion of additional permitted uses to allow for much needed services and allow for small-scale local enterprise to be established.

The City should be proactive and help create opportunities for those who not yet slipped below the Low Income Cut-Off levels, instead of waiting for a minimum of 29% of residents to fall behind. Retaining the minimum 29% of current residents living below the Low Income Cut-Off is simply another way of saying to a vast majority of residents that they and their neighbours are too wealthy. How many residents need to be living below the Low Income Cut-Off before the City cares?

GTAA respectfully requests that residents’ income be removed as criteria. That the Residential Apartment Commercial zoning in the City Wide Zoning By-law be applied City Wide.

Sincerely,

Daryl Chong
President & CEO
Greater Toronto Apartment Association