November 7, 2017

By Email: teycc@toronto.ca; cc Gord Perks Councillor_Perks@toronto.ca; Kirk Hatcher Kirk.Hatcher@toronto.ca

To the City Clerk:

Please add my comments to the agenda for the November 14, 2017 Toronto and East York Community Council meeting on item 2017.TE28.5, 1182 King Street West and 1221 King Street West -Zoning Amendment Application - Final Report

I understand that my comments and the personal information in this email will form part of the public record and that my name will be listed as a correspondent on agendas and minutes of City Council or its committees. Also, I understand that agendas and minutes are posted online and my name may be indexed by search engines like Google.

Sistering is a multi-service agency for at-risk, socially isolated women in Toronto who are homeless or precariously housed. We have been serving this community for over 35 years, validating women’s experiences regardless of outcomes. In November 2015, Sistering became a 24/7 Drop In for women.

Sistering’s target population is women across Toronto who experience firsthand the impact of marginalization and poverty. They may be without homes, sleeping outside, living in Out of the Cold programs or shelters, or poor and at risk of becoming homeless. We serve a diverse group of women aged 16 to 80 plus: women with substance use and mental health issues; sex workers; women who have interactions with the criminal justice system; women who have experienced, or are experiencing, trauma and violence; immigrant and refugee women; women with health issues and disabilities; and women without legal status.

As the Executive Director, I am writing to express my objection to the 1182-1221 King St W Rezoning Application by Lifetime Developments as it stands. Community members have voiced significant concerns about the impact that the 703-unit luxury condo development will have on the neighbourhood. These concerns include:

- Lack of affordable housing and affordable commercial space
- Excessive height and density in an over-capacity transit corridor
- Impact on neighbourhood affordability, diversity, equity, and inclusion

For the past three public meetings, Parkdale residents and workers have made it loud and clear that the development exceed what is allowable, does not address local needs, and will have a negative ripple effect on the surrounding neighbourhood affordability. When you consider the demographics of the Neighbourhood Improvement Area of South Parkdale - 90% renters and 32% living on low income - the pressures for displacement are significant. Yet throughout the consultation process, and the development process more broadly, it has become evident that local community needs are not a priority.
The lack of transparency in the process for determining Section 37 funds further raises concerns about how this community benefit has been quantified and negotiated for the neighbourhood. A $2.1 million settlement in Section 37 funds does not represent a significant agreement for community benefits based on the scale of this development, and in comparison to the well-documented needs of this community. There are over 30 community-based organizations that are working collaboratively as the Neighbourhood Planning Table for South Parkdale to build a Community Benefits Framework for the neighbourhood. I value that Councillor Gord Perks has prioritized affordable rental housing, as has been identified as a top priority through community planning activities. That being said, it is disheartening to see that community groups were not consulted in the process. There needs to be more transparency and more community partnership at the decision-making level for land-use planning of this scale.

In lieu of a transparent process to discuss what a fair agreement might look like, I recommend that the Toronto East York Community Council, Councillor Gord Perks, and City Planning consider the following alternative options:

- **105 affordable residential units with at least 35 units set as deeply affordable, or $16.8 million cash-in-lieu in Section 37 funds.**
- **Two affordable commercial units for locally-serving businesses**
- **A commitment to inclusive local hiring for 10% of the total work hours for trade**

With the City of Toronto preparing to introduce policy for Inclusionary Zoning, now is the time to set a precedent in Parkdale. Inclusionary Zoning would require developments exceeding 20-60 units to set at least 10% of new units as affordable, or the equivalent of the Ground Floor Area as the set-aside rate. As a Neighbourhood Improvement Area, we should demand a minimum of 15% affordable units in Parkdale, with at least a third set aside as deeply affordable units at shelter allowance rates. At 1182-1221 King St W., this would translate to 105 affordable units, with at least 35 units set as deeply affordable. Alternatively, the City could negotiate a Section 37 for the equivalent of 105 units at $160,000, which would come to $16.8 million cash-in-lieu. The current Section 37 proposal of $1.9 million for affordable rental housing represents only 11% of what we should expect as a bare minimum.

Likewise, numerous local businesses are being priced out of the local neighbourhood due to increasing lease and tax rates. The closure of locally-serving, long-term businesses has led to the loss of culturally-relevant and accessible goods and services. The City is currently exploring tax incentives for property owners who lease commercial units to small businesses at an affordable rate. In Parkdale, an affordable rate would range from $20-$25 per square foot. At 1182-1221 King St W., at least one unit in each building should provide affordable commercial space for local businesses.

Finally, we would like to see the developer commit to generating inclusive local employment through partnerships with pre-employment apprenticeship programs and early career placements for residents who come through a local hiring program. At 1182-1221 King St W., at least 10% of all trade hours should go towards apprentices or workers from local equity-seeking groups.

Until Lifetime Developments, the City of Toronto, and the local community reach an agreement that accounts for these local needs, I will not support this application. I call upon the Toronto East York
Community Council, the City Planning Office, and the Ward 14 Councillor’s Office to reconsider this proposal and re-negotiate any potential community benefits from a just and progressive planning perspective. Let’s continue to work together towards more equitable development in this neighbourhood.

Sincerely,

[Signature]
Patricia O’Connell
Executive Director
Sistering