

December 13, 2021

City Council  
Marilyn Toft  
12th floor, West Tower, City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2

*Sent electronically*

### **RE: PH29.3 Recommended Parking Requirements for New Development**

The Residential and Civil Construction Alliance of Ontario (RCCAO) is pleased to provide its support for the above-noted item and for its intent to remove minimum parking requirements city-wide and implement maximum parking limits in Toronto. Reviewing and modernizing parking requirements have been a focus of RCCAO for some time and we have worked diligently with City staff and senior City management on this issue.

In 2019, RCCAO commissioned a report, entitled [“How Parking Regulations Need to Evolve for High-Rise Buildings”](#). The report found that there is a clear mobility shift in many urban areas owing to a wider array of mobility options. Further, the report found that:

- The cost of constructing below-grade parking has increased rapidly over the last decade, often between \$80,000-\$100,000 per parking space in downtown Toronto;
- These costs are passed onto unit owners, negatively impacting housing affordability;
- Constructing underground parking adds to the already lengthy and complex construction process for high-rise buildings; and
- Deep multi-level underground parking structures necessitated by minimum parking requirements incur groundwater challenges that can burden aging sewer infrastructure or pose problems to make watertight

RCCAO commends the City for undertaking this review and being responsive to the changing transportation modes in urban environments. Building too much underground parking has consequences, including unnecessarily increasing construction costs, overloading stormwater and sewer infrastructure systems, and generating vast quantities of soil that must be transported and disposed of.



Although not part of this review, RCCAO urges the City, in its future work on this topic, to consider how above-grade parking can be utilized to improve urban design. This concept presents myriad of opportunities including alleviating pressure from the presence of groundwater and allows for several future repurposing options, including for housing and business needs.

RCCAO was pleased that the Planning and Housing Committee unanimously passed the Parking Review motion during its November meeting, and we hope that City Council will follow suit and adopt the proposed policy direction. We would also urge that should the policy be adopted, it be implemented and operational in 2022.

Regards,

A handwritten signature in black ink, appearing to read 'Nadia Todorova', is positioned below the 'Regards,' text.

Nadia Todorova  
Executive Director

**Copy to:**

- Chris Murray, City Manager
- Tracey Cook, Deputy City Manager
- Gregg Lintern, Chief Planner & Executive Director
- Barbara Gray, General Manager, Transportation Services
- Matt Keliher, General Manager, Solid Waste Management Services
- James Perttula, Director, Transit and Transportation Planning
- Michael Hain, Manager, Transportation Planning Policy and Analysis
- Lou Di Gironimo, General Manager, Toronto Water