



October 2, 2021

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

**RE: MM36.33 - Assessing the Impacts of Iceberg Houses - by Councillor Jaye Robinson, seconded by Councillor Mike Colle (Ward All)**

Dear Mayor John Tory and Members of Council,

This correspondence is to advise of FoNTRA's strong support for this Member's Motion. Iceberg houses are single-family houses with multi-storey underground basements below, and that may extend well beyond, the above-ground footprint of the structure. We have seen various examples recently, including the particularly notable instance in Hoggs Hollow.

In November 2020, the Committee of Adjustment approved an Iceberg home in Hoggs Hollow - a City designated Natural Heritage System located in a flood plain. Hoggs Hollow is also subject to a 1 hour evacuation in the event of a dam release on the Don River. Despite numerous objections from Urban Forestry, a healthy 250 year old sugar maple was removed.

As a federation of resident associations we are concerned about the adverse impact of these structures, and the apparent lack of regulatory oversight. It appears that the "iceberg aspects" are not subject to rigorous zoning and building code requirements. These concerns include:

1. Public Safety – related to the mandates of Toronto Police Services, Toronto Fire Services and Toronto Paramedic Services; the lack of requirements for secondary emergency exits and emergency lighting. Are these Services briefed on residential two-three storey basements evacuation procedures? Clearly these structures have the potential to put Service personnel at extra risk during floods, fires, power loss, etc. Does the City expect personnel to enter structures with little to none emergency evacuation measures present?
2. Flood Plain Mapping - The City relies on the TRCA for Flood Plain Mapping. Iceberg homes create the potential of diverting water, and could affect the reliability of Flood Plain Mapping.
3. Housing Standards – Are current regulations sufficient? Iceberg homes can be erected anywhere creating an opportunity for multiple occupancy housing e.g. rooming houses, BUT no windows which are needed for habitation? And at a significant fire risk, and public health issues due to damp and mould.
4. Diversion of water creating soil instability, and erosion.
5. Damage and/or removal to mature trees.
6. Impact of drainage on adjacent buildings, including collapsing foundations and water ingress, and City drainage and storm water management.

