

November 23, 2021

Planning and Housing Committee
Nancy Martins
10th 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 looks forward to continuing collaboration and engagement with the City on this important issue and hopes that members of the Planning and Housing Committee will vote to 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 cursive script, 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
Councillor Ana Bailão, Chair, Planning and Housing Committee