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To: [councilmeeting](#)
Cc: [Susan Allen](#); [Gary Sands](#); [Celeste Wright](#); [Amy Harrell](#); arobertson@torontofinancialdistrict.com
Subject: [External Sender] Submission re: Item EC 16.2 - Sidewalks to Skylines: An Action Plan for Toronto's Economy (2025-2035) (Ward All)
Date: November 12, 2024 9:53:49 AM
Attachments: [image001.png](#)
[Letter re Parking Levy undermines Action Plan for Toronto's Economy.Nov 2024.FINAL.pdf](#)

Good morning,

Attached please find a submission on behalf of the industry stakeholders listed below regarding *Item EC 16.2 - Sidewalks to Skylines: An Action Plan for Toronto's Economy (2025-2035) (Ward All)* on the Agenda for tomorrow's City Council Meeting.

- BOMA Toronto
- Canadian Federation of Independent Grocers
- NAIOP GTA
- REALPAC
- Toronto Financial District BIA

Please let me know if you have any questions.

Best regards,
Gayle

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November 12, 2024

Mayor Olivia Chow and Council Members
100 Queen St W, 2nd Floor
Toronto, ON M5H 2N2
By email: councilmeeting@toronto.ca

Dear Mayor Chow and Members of Toronto City Council,

**Re: Agenda Item EC 16.2:
Commercial parking levy undermines the *Action Plan for Toronto's Economy***

We the undersigned organizations, representing a range of stakeholders concerned about the economic success of our City, are writing with respect to the recently released "*Sidewalks to Skylines: An Action Plan for Toronto's Economy*".

First and foremost, we commend the work of City Staff and the Economic Advisory Panel in setting out an ambitious and much-needed 10-year strategic plan to address current challenges and drive long-term economic success and growth in the City. This is a goal we all share.

There are several initiatives in the Action Plan that we support, and we look forward to working with the City to help bring them to fruition. But we also have serious concerns that a number of proposals currently being considered by Council run directly contrary to – and undermine the objectives of – the Action Plan.

In particular, **the commercial parking levy is completely at odds with the Plan's express commitments to support small businesses**, to "*Keep small businesses open and thriving*" (Action 11), "*Protect small businesses from rising costs*" (Action 12) and "*protect the unique fabric of Strong Main Streets*"

As you are aware, the City is considering introducing a commercial parking levy (\$6/sqm within core areas and \$3/sqm outside) as a potential source of revenue to help mitigate the City's budgetary shortfall. The City has also argued that the levy has potential to help tackle climate change by discouraging the use of private modes of transportation.

Findings from a study undertaken by Altus Group (the "Altus Study"), however, raises concerns that a commercial parking levy will not accomplish either of these goals. Specifically, the Altus Study suggests that a commercial parking levy will:

- *Be disproportionately punitive against small businesses*
 - Small businesses are less likely to be able to absorb the financial impacts of the proposed commercial parking levy, which systematically functions as an increase in property tax
- *Not generate predicted revenues*
 - As acknowledged by City Staff, the implementation of a parking levy will likely lead to a decline in investment and in non-residential property values. As such, the

commercial parking levy will likely generate only \$10 million to \$15 million in net revenue, not the \$100 million to \$150 million in annual revenue predicted.

- *Not achieve the desired policy outcomes.*
 - The current proposal does not disincentivize the use of cars as businesses – not drivers - will incur the costs of the parking levy.

While we appreciate that the City faces serious financial challenges, a parking levy is not the solution. As the Action Plan states, “*Supporting small businesses is not just an economic imperative; it’s essential for preserving the community character that makes Toronto a dynamic, desirable, and inclusive city*”. (p. 38)

We are convinced that a key to Toronto’s success is set out in *Action 1: Achieving a new long-term intergovernmental funding deal for Toronto*. **We remain committed and available to work with the City to achieve its goals** and would welcome the opportunity to support the City in its efforts with other levels of government.

We look forward to discussing how we can work together to ensure the long-term economic success and vibrancy of our City.

Sincerely,

BOMA Toronto
Canadian Federation of Independent Grocers
NAIOP GTA
REALPAC
Toronto Financial District BIA