



June 12, 2025

**Nancy Martins**

Toronto City Hall

100 Queen Street West

Toronto, Ontario M5H 2N2

Email [PHC@toronto.ca](mailto:PHC@toronto.ca)

Attn: Planning and Housing Committee

**EY22.3 – Expanding Housing Options in Neighbourhoods –  
Multiplex Monitoring Final Report**

While we appreciate the opportunity to provide input, the volume and complexity of the materials released—combined with the extremely short turnaround time—make it nearly impossible for residents and community organizations to engage in a meaningful way. This approach creates a barrier to informed public participation and risks undermining the very goals of consultation and transparency.

There are 19 Attachments to this item's Report. The Draft Zoning By-law amendment itself is 47 pages and requires a significant amount of time to understand the changes being proposed as **the amendments are NOT HIGHLIGHTED** or called out. The whole is a data dump that was not available at the time of the March 2025 meetings and April 8 2025 City-wide meeting where there was an opportunity to ask questions.

Clearly the information in this report was available earlier as the data analyzed is from May 2023 – November 2024 – 7 months ago. There has to be a significant amount of more current data that is missing from this Report.

We urge the City to reconsider its engagement processes. Releasing critical documents prior to public meetings with more reasonable timelines, providing clear summaries, and staggering consultations would go a long way in supporting thoughtful, informed contributions from the public. These are not just procedural improvements—they are essential for building trust and ensuring policies reflect the values and needs of the communities they affect.

Residents are ready and willing to contribute, but they need a process that respects their time, capacity, and desire for genuine dialogue.

## **Comments on the Recommendations for Multiplex Monitoring**

1. Creating the term “houseplex” does nothing to address the concerns expressed during the consultations that these by-laws are being used build monster homes with a framed in secondary suite that may or may never provide additional housing units.
2. Waiting until the end of 2027 is far too long for the City to report on monitoring of these changes to Multiplexes. This Report only reports on 222 Building Permits and only 108 closed permits where the multiplexes are actually built.
3. Tracking and reviewing the number of by-law protected trees damaged or removed as a result of the construction of multiplex developments is inadequate.

Only 11.9% of trees in Toronto are of protected size (30cm DBH or greater). Multiplex monitoring has failed to gather data on the 88% of trees making up Toronto’s Urban Forest that are below protected size and have been removed by these Multiplex building permits. This Report does not address the number of trees that may be at risk of loss through Multiplex applications. This is a major concern given the policies that aim to prioritize climate action, preserve existing trees and the City’s goal of increasing the Tree Canopy to 40%.

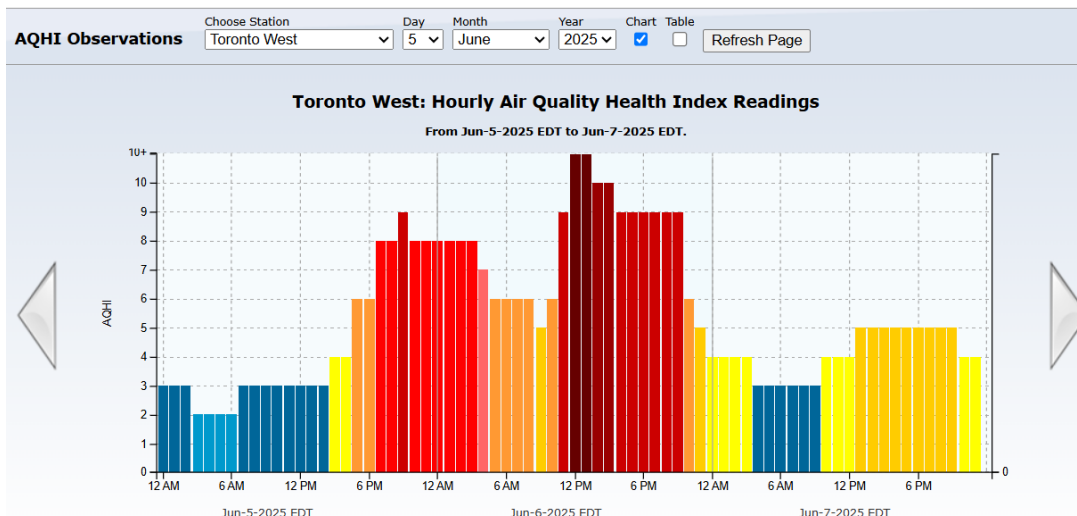
The Growing Space Report was supposed to be approved prior to further EHON changes. We are disappointed that the Planning and Housing Committee is moving forward with these changes to Multiplexes prior to securing better protection for trees.

Monitoring of the impacts of Multiplexes on the Tree Canopy needs to go beyond the permitting stage and look at the impacts on the tree canopy post construction. Many trees that are to be protected do not thrive following their injuries and require removal following construction. There needs to be follow-up monitoring post construction. Also to monitor how many sites actually plant and care for trees vs paying cash in lieu or planting a tree that does not survive.

The Final Report for the Multiplex Monitoring Program did not gather data or assess the impact of greater building footprint or other design features that could reduce permeable surface areas.

The Multiplex Monitoring Final Report states that the reduction of permeable area can lead to less rain infiltration and therefore greater runoff which could increase loading on the storm system. Particularly for areas of the city that have a combined sewer system. The Report goes on to state that in these areas where combined sewers are located, longer-term concentration of multiplex development has the potential to exacerbate existing constraints to adequate sewer capacity during wet weather flow. This may increase the risk of basement flooding – something that is already a recurring problem for most of Long Branch.

Toronto’s air quality ranked second worst in the world on Friday, June 6, 2025 – reaching an air quality index of 173. At this level seniors, pregnant women, infants, young children and people who work outdoors, as well as people with an existing illness or chronic health condition are more likely to be impacted.



Wildfire smoke is a complex mixture of particulate matter and gases. Particles less than 2.5 microns in size (PM<sub>2.5</sub>) are of greatest health concern as they can penetrate deep into the lungs and are associated with a number of health effects. Severe symptoms include dizziness, chest pains, difficulty breathing, wheezing, heart palpitations. It can also exacerbate existing respiratory and cardiovascular diseases such as asthma, chronic obstructive pulmonary disease, congestive heart failure, etc.

90% of the total particle mass of wildfire smoke can be PM<sub>2.5</sub>.

Below are the data measured in Toronto less than a week ago. There is no “safe” level of PM<sub>2.5</sub>, as any exposure can have health impact, but it is generally considered safe at or below 12 µg/m<sup>3</sup>. Short term exposure of 35 µg/m<sup>3</sup> is considered unhealthy. Toronto, particularly Toronto West, far exceeded those levels.

#### Air Pollutant 1-Hour Concentrations For June 6, 2025, 12:00 pm EDT

Station	O <sub>3</sub> (ppb)	PM <sub>2.5</sub> (µg/m <sup>3</sup> )	NO <sub>2</sub> (ppb)	SO <sub>2</sub> (ppb)	CO (ppm)
Toronto Downtown	35	81	12.4		
Toronto East	39	89	2.7		
Toronto North	43	96	3.5	0.5	
Toronto West	46	106	5.5	0.1	0.66

Ref: Ontario Ministry of the Environment, Conservation and Parks [airqualityontario.com/aqhi](https://airqualityontario.com/aqhi)

Trees remove pollution from the air by direct absorption through their leaves as well by capturing particulate matter on and in plant tissue. This benefit is linked to leaf area and function.

Trees remove ozone (O3); nitrogen dioxide (NO2), carbon monoxide (CO), small Particulate Matter PM<sub>2.5</sub> and sulphur dioxide (SO2). In 2008, Toronto's trees were estimated to remove approx. 1.906 tonnes of pollution per year. As of 2018, this has declined to approx. 972 tonnes of pollution per year.

According to the 2018 Toronto Canopy Study, Toronto's Total Leaf Area of its urban forest has actually decreased. From a total Leaf area of 101,500 ha in 2008-2009 to 90,516 ha in 2018. This is an 11% loss in Total Leaf Area. Recently planted/young trees contribute much less to the total leaf area of the urban forest which is why it is so important to retain healthy, mature large trees.

There is no data in this Report showing that multiplexes will support increasing the tree canopy to the goal of 40% yet Long Branch has data to show intensification results in substantial loss of tree canopy.

Multiplexes form an important housing option. But most multiplexes that Long Branch has had historically have greater setbacks, more green space, more permeable surfaces, more trees and more appropriately sized to fit into the neighbourhood.

We hope this Committee will ask staff to properly review the Zoning By-law Amendments being proposed with taxpayers who will be impacted and get proper feedback prior to moving forward the staff recommendations. And put in place stronger tree protection so that the City has a chance to achieve its 40% Tree Canopy increase with confidence.

Sincerely,



Christine Mercado  
Chair,  
Long Branch Neighbourhood Association  
Longbranchnato@gmail.com



Judy Gibson  
Director,  
Long Branch Neighbourhood Association  
Chair, Tree Canopy Preservation and Enhancement  
Committee

Cc

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