



Parking Strategy Report

Item 6F

June 13, 2023

Tenant Services Committee

Report: TSC:2023-30

To: Tenant Services Committee (“TSC”)

From: Chief Operating Officer (Acting)

Date: May 5, 2023

PURPOSE:

The purpose of this report is to provide the TSC with an overview of TCHC's Parking Strategies, including details on parking revenues, arrears collection, enforcement, and limitations.

RECOMMENDATIONS:

It is recommended that the TSC receive this report for information.

REASONS FOR RECOMMENDATIONS:

At its meeting on March 28, 2023, the Tenant Services Committee (“TSC”) directed management to report on TCHC’s Parking Strategies regarding:

1. Processes for assigning parking spots and limitations by unit;
2. Enforcement capacity and processes;
3. Tenant, non-tenant, and commercial parking revenues;
4. Arrears related to tenant, non-tenant, and commercial parking (extent of arrears for each); and
5. Strategy to charge for parking to address parking arrears.

Process for Assigning Parking Spots

To ensure efficient parking management and prevent unauthorized vehicles from using spaces, tenants must register their vehicles and agree to pay a monthly fee for parking. Once registered, tenants receive a permit and a designated parking space. This registration process occurs at the Service hub level, where the permit number is recorded and serves as proof of consent for the vehicle to park on the registered property.

To secure approval to park at Toronto Community Housing Corporation (“TCHC”) properties, visitors must follow one of the established protocols below:

- Purchasing a permit through Green P or another vendor and displaying it in a designated visitor parking area. Pay and Display is an option not available in North York.
- Securing a permit from the tenant they are visiting. The visitor must adequately fill out the permit and display it while parked in a designated visitor parking area. The number of permits that can be obtained is limited to nine per month.
- Personal support and care workers may require long-term or short-term permits. In such cases, arrangements can be made on a case-by-case basis, which may include consent to park in staff spaces after regular business hours or in visitor lots that are not Pay and Display.

Each parking lot on TCHC properties has designated parking spaces, which are assigned unique numbers, and tenants are assigned a specific parking space within the lot. In some cases, construction or capital projects may temporarily impact parking assignments. However, these issues should only last for the construction project’s duration, after which parking spaces will be reassigned to their original locations.

Enforcement Capacity and Processes

Parking enforcement on TCHC properties is carried out by the Community Safety Unit (“CSU”), which designates some of its uniformed members as Municipal Law Enforcement Officers (“MLEO”) in coordination with the Toronto Police Service (“TPS”) Parking Enforcement Unit. Two uniform

designations within the CSU, Special Constables (“SPC”) and Parking Enforcement Officers (“PEO”), serve as MLEOs.

In addition to CSU MLEOs, members of the TPS Parking Enforcement Unit and TPS police constables authorized by the City can also engage in enforcement activities on TCHC properties.

TCHC Municipal Law Enforcement Officers

MLEOs can enforce parking regulations on registered tenant vehicles by referencing the parking registry, which provides details on where a vehicle is authorized to park. If a vehicle is parked in an unauthorized area, MLEOs can investigate whether consent to park exists. If there is no consent, enforcement actions may be taken.

In instances related to fire routes and accessible parking spaces, MLEOs are authorized to enforce parking regulations without a call for service or complaint. They can take necessary enforcement actions, such as issuing a parking ticket or ordering the vehicle to be towed.

TPS Parking Enforcement Unit and TPS Police Constables (“TPS”)

The TPS Parking Enforcement Unit and TPS police constables authorized by the City can also enforce parking regulations on TCHC properties. In instances related to fire routes and accessible parking spaces, The City can self-initiate enforcement without a call for service or complaint.

For enforcement in tenant parking spaces, TPS must take action based on calls for service or complaints. In such cases, the complainant (tenant) must provide the registration document that assigns their vehicle to a parking space. TPS will investigate whether the vehicle is parked with consent, and if not, take enforcement actions such as issuing a parking ticket or ordering the vehicle to be towed.

Parking Revenue

The standard monthly rate for tenant parking is \$50, with some exceptions. In the Central district, for example, tenant parking rates were increased to \$75 per month following the decommissioning of non-tenant parking approximately three years ago. Nonetheless, TCHC's parking rates remain

significantly lower than those of comparable parking facilities across the City of Toronto.

The combined parking revenues from commercial, tenant, and non-tenant parking from 2021 to 2023 are as follows:

Table 1: TCHC Parking Revenues

Year	Amount (Millions)
2021	\$10.8M
2022	\$10.8M
YTD 2023	\$2.8M

Parking Arrears

The total parking arrears for tenant, non-tenant, and commercial parking from 2021 to 2022 are as follows:

- In 2021, the parking arrears totaled \$748K for commercial, tenant, and non-tenant parking combined.
- In 2022, the parking arrears increased to \$1.1M for commercial, tenant, and non-tenant parking combined.

Table 2 provides a breakdown of the parking arrears by parking type as of March 2023.

Table 2: TCHC Parking Arrears, March 2023

Parking Type	Arrears Amount
Tenant	\$1,955,408
Non-Tenant	\$347,512
Commercial	\$26,744

Parking Strategy

Through consultation with Legal, it has been determined that parking at TCHC properties is considered a service under the *Residential Tenancies Act* (“RTA”). This means that once parking has been provided to a tenant, it cannot be arbitrarily withdrawn or canceled without violating the RTA. Therefore, to address parking arrears, processes are being implemented to bring these matters before the Landlord and Tenant Board (“LTB”).

Operations Leadership has discussed procedures for handling delinquent tenant parking accounts, which will require advanced consultations with Legal. These procedures will be updated to include more attempts at consultation and mediation, such as sending letters from service hubs to advise tenants of their account delinquency, and will take place before the CSU takes any enforcement action.

To address the parking space shortage, the non-tenant parking program (not commercial parking) was analyzed with the intent of decommissioning the program and freeing up approximately 400 parking spaces throughout the City that were used by non-TCHC tenants. Through consultation with other business units, it has been determined that there are closer to 1,400-1,500 non-tenant spaces in the TCHC parking inventory. While no new vehicles are being registered under the non-tenant parking program, no accounts have been cancelled since June/July of 2022 and revenue connected to current spaces has not been lost. Moving forward, the expectation is that tenants that require parking will replace a non-tenant parker on a case by case basis.

In terms of next steps, Management will:

1. Finalize documents with Legal Services that outline the process for addressing tenant accounts in arrears for parking. These documents will clearly outline TCHC's steps to address accounts in arrears, including the consequences for non-payment.
2. After legal consultation, TCHC will develop a procedure for generating letters of warning, cancellation of parking privileges, and Tenancy Management through the LTB, if required.

IMPLICATIONS AND RISKS:

If TCHC fails to address the issue of parking arrears, it could result in continued financial losses to the corporation as it seeks to reduce spending and find operational efficiencies. The corporation faced total combined parking arrears of \$1.1M in 2022, and allowing arrears to grow continually could lead to the loss of a significant revenue generation tool that can assist in funding operations, in turn having a negative impact on TCHC's

tenants and communities. Additionally, failing to increase monthly rent for tenant parkers could further exacerbate the financial implications.

Different parking rates throughout the city may also create concerns that parking rates are not fairly applied across the regions. Increasing parking rates may also have negative implications for TCHC. After the COVID-19 pandemic ended, many families continue to face financial struggles. Addressing parking arrears through the LTB could also become a lengthy process, similar to what is faced when resolving rental arrears.

Therefore, it is essential to take a balanced, fair, and open approach to resolving accounts in arrears, providing tenants with ample opportunities to clear arrears before taking action that could cause further financial implications for tenants.

SIGNATURE:

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