
TO: GENERAL COMMITTEE

SUBJECT: REGULATING BOARDING LODGING ROOMING HOUSES (BLRs)

WARD: ALL

PREPARED BY AND KEY CONTACT: G. ALLISON, DIRECTOR OF BUILDING AND BY-LAW SERVICES, EXTENSION #4323

SUBMITTED BY: G. ALLISON, P.ENG., CBCO
DIRECTOR OF BUILDING AND BY-LAW SERVICES DEPARTMENT

GENERAL MANAGER APPROVAL: PATRICIA ELLIOTT-SPENCER, MBA, CPA, CMA
GENERAL MANAGER OF COMMUNITY AND CORPORATE SERVICES

CHIEF ADMINISTRATIVE OFFICER APPROVAL: C. LADD, CHIEF ADMINISTRATIVE OFFICER

RECOMMENDED MOTION

1. That the staff in By-law Services use their best efforts within their existing resource capacity to identify potential Boarding Lodging Rooming Houses (BLRs) through the monitoring of "Rooms for Rent" advertising and investigate as feasible to confirm compliance with the Zoning By-law, the Building/Fire Codes, the Property Maintenance By-laws and the Municipal Licensing By-law.

PURPOSE & BACKGROUND

2. The purpose of this staff report is to respond to the following requests from Council:

Pending Item P65/12

That staff in the Building Services Department in consultation with the Legal Services Department be directed to provide a report to General Committee with a plan to identify establishments, as well as implement proactive enforcement of licensing, property standards, building code and fire code provisions for BLRs located in RM2 zones.

Pending Item P55/13

That staff in the Building and By-law Services Department provide a report to General Committee with respect to the implementation and effectiveness of the provision related to BLRs in the Zoning and Business Licensing By-laws and any recommendations to enhance the current provisions to improve the City's ability to enforce the requirements that are intended to protect the safety of the residents and address matters that may impact neighbouring property owners.

ANALYSIS

Rental Residential Accommodations

3. Many residents of Barrie rely on rental housing to establish a home for a temporary time period, or until they can perhaps afford to purchase a house or a condominium. Some residents will rely on rental housing for most of their adult lives.
4. Rental housing can take on various forms including but not necessarily limited to;
 - (a) individual dwelling units located within apartment buildings,
 - (b) individual dwelling units located within single detached, semi-detached or townhouse structures,
 - (c) second suites created within what used to be a single dwelling unit, or within a detached accessory building associated with a single detached dwelling unit on the same property,
 - (d) single rooms rented within a single dwelling unit, or
 - (e) single rooms within a building other than a single dwelling unit with access to a private or a shared bathroom, and may or may not have access to other shared facilities such as a kitchen, laundry, or living areas.
5. The City's Planning Services staff have helped guide Council to establish zoning standards for where each housing type should be located, and any applicable development standards such as parking, building height and lot coverage.

BLRs – What Are They?

6. In the City of Barrie, the specific definitions of a Boarding Lodging Rooming House (BLR) and a Dwelling Unit are found within both the Zoning By-law and the Licensing By-law.
 - (a) Zoning By-law 2009-141 as amended defines a BLR as *“a dwelling where lodging is provided for one or more tenants where at least 1 of the tenant-occupied rooms is equipped with an external locking mechanism that prevents access to said room by other house occupants when the room is unoccupied or; lodging is provided for more than 4 tenants; but shall not include a group home, hotel, motel, hospital, children’s home, nursing home, rest home, home for the aged, or a bed and breakfast establishment, or other similar establishments.”*
 - (b) The Zoning By-law goes on to define a Dwelling Unit as *“except for a BLR a dwelling unit shall mean a suite operated as a housekeeping unit used or intended to be used as a domicile by 1 or more persons and usually containing cooking, eating, living, sleeping and sanitary facilities.”*
7. These definitions were intended to copy the definitions in the Building and Fire Codes in effect at the time, but modified to establish a hierarchy where the definition of a BLR would trump the definition of a dwelling unit. If a house is occupied by more than four tenants, or there are external locks on the tenanted bedroom doors, the house would be considered a BLR even if the occupants operated as a single housekeeping unit.
8. The definition in the municipal Licensing By-law for BLRs is identical to the definition in the municipal Zoning By-law.

BLRs – Where Are They Allowed?

9. The Zoning By-law is the municipal planning tool used to allocate where a BLR, as defined in the By-law, can be located.
10. Small BLRs (not more than six tenants) can be located in all Single Detached Residential Zones (RH, R1, R2, R3 and R4), all Multiple Residential Zones (RM1, RM2-SS, RM2 and RM2-TH) and all Apartment Residential Zones (RA1 and RA2). The development standards from the Zoning By-law include;
 - can contain a maximum of 1 kitchen
 - must contain a least 1 bathroom and at least one other room
 - each rented sleeping room or suite shall have a minimum of 7m² of habitable living space
 - the total aggregate floor area of all sleeping rooms shall not exceed 40% of the total habitable living space
 - the occupants must operate as a single housekeeping unit
 - each new small BLR must be located at least 75m from another licensed BLR in an R1, R2, R3, R4 or RM1 zone
 - off-street parking must be provided at the rate of 1 space for every two tenants, with tandem parking allowed
 - each required parking space must be at least 2.7m wide by 5.5m long
 - the front yard must be landscaped open space except for the portion occupied by parking spaces or driveway
 - the maximum front yard area allowed to be used for off-street parking and driveway is 50% in R1, R2 and R3 zones, and 60% in R4, RM1, RM1-SS, RM2 and RM2-TH zones.
11. Large BLRs (more than six tenants) can be located in RM2 Multiple Residential zones, and in RA1 and RA2 Apartment Residential Zones. The development standards from the Zoning By-law includes;
 - each rented sleeping room or suite shall have a maximum of 7m² habitable living space
 - off-street parking requirements are the same as for small BLRs
 - the front yard must be fully landscaped except for any parking spaces and driveway that can occupy a maximum of 60% in an RM2 zone.
12. Attached to this report as Appendix 'A' are maps of each ward showing the location of all 26 licensed BLRs in the city, with 16 located in Ward 1 and another 10 located in Ward 2. The maps also show the 822 registered Two-Unit Houses for information purposes.

Licensed BLRs versus Unlicensed BLRs

13. Council has directed staff to report on a plan to identify unlicensed BLRs in all residential zones, including specifically the RM2 Zones, and to implement proactive enforcement to ensure all identified BLRs are compliant with the regulatory provisions of the Building Code and Fire Code, and with the municipal Zoning By-law, Property Standards By-law and Licensing By-law.
14. The only way to know how a dwelling unit is being occupied is to speak with the occupants and to inspect the dwelling's interior. Whereas locks on bedroom doors and the number of tenants contribute to the definition of a BLR, each house being occupied by tenants would need to be inspected to look for locks and to count the number of tenants residing in the unit. Distinguishing between tenants who are paying rent for the room versus friends visiting for the day or a short stay in the 'guest room' can be challenging.

15. Inspecting the interior of an occupied dwelling unit requires the informed consent of at least one of the tenants. Informed consent occurs when the occupant, being of an age of 19 years old or greater, agrees to let an officer into the dwelling unit to gather evidence regarding the use and occupancy of the dwelling unit after being informed by the officer they have the right to refuse entry. Individual tenants can refuse entry into their portion of the dwelling unit.
16. Inspections can only obtain conditions within the building available at the time of inspection such as what could be captured in a photograph. Other evidence requires the truthful testimony of any reliable persons who have knowledge of the information the officer is seeking, such as how many people are tenants of the dwelling. Separate lease agreements, if available to the officer, don't indicate how many leases actually exist.
17. Currently investigations of alleged BLRs are initiated;
 - (a) Upon receipt of a complaint from an identified complainant, which is usually a tenant, a neighbour, or from a Councillor on behalf of a neighbour, and
 - (b) From Fire Prevention staff or from By-law staff who discover a possible BLR in the course of their investigations into other complaints.
18. Over the last three years (2013-2015), there have been 226 investigation files in By-law Services related to alleged BLRs, which is an average of 75 investigations a year. This includes about 50 public complaints and 25 files generated by referrals or street blitzes. The outcomes of those investigations were;
 - (a) 47% (almost half) were actually single dwelling units containing not more than 4 tenants, if any, and no locks on the bedroom doors,
 - (b) 40% were found to be unlicensed BLRs, and
 - i. 80% of those were converted back to single dwelling units by the reduction of tenants to no more than four, and/or the removal of any locks on bedroom doors, at least at the time of the re-inspection, and
 - ii. 20% have since obtained the required license, or are in the process of doing so, and
 - (c) 6% were found to be unregistered two-unit houses, and
 - (d) The remaining 7% were unable to be resolved due to a lack of evidence of how the house was being occupied.

Options for Enhanced Investigations

19. In addition to the current volume of 75 investigations per year being handled, Council has asked for options to find more potential unlicensed BLRs, investigate them, and if found, to force compliance by either converting the use back to a single dwelling unit, or to force the owner to license the BLR if that option is available.
20. Opportunities to seek out potential unlicensed BLRs include;
 - (a) Monitor advertisements of "rooms for rent" published in local papers, posted on the internet or pinned on local bulletin boards. Contact would be made by phone, text or e-mail to try and speak with the person(s) advertising the room for rent and seeing if an appointment can be made to meet at the location. Informed consent would be required to enter the residential unit to gather evidence, meaning the host has the option to refuse entry once informed of our intentions.
 - (b) Monitor exterior property conditions such as the parking of more than three vehicles at a dwelling on a regular basis and adding the property to a list for further investigation of the building's actual use.
 - (c) Check the tax roll for owners of multiple single dwelling units and adding those properties to a list for further investigation.
 - (d) Encourage residents to 'snitch' on known or suspected BLRs by reporting them through the City's on-line complaint forms. Those locations would be added to the list for further investigation.
 - (e) Conduct more frequent street blitzes where 20-30 homes in a random area of the City are visited, attempting to speak with the occupants and asking about the use and occupancy of their home and of the homes around them. If informed consent can be obtained, the officer would inspect the home interior to confirm compliant use of the space.
21. Of course any attempts to identify more homes that may potentially contain an unlicensed BLR will require resources that are not currently being deployed for this purpose. Creating a bigger list for investigations will also require more resources to do the investigations and any subsequent enforcement and follow-up to bring those properties into by-law compliance where necessary.
22. This increased service level will require additional resources, or the redeployment of existing resources that are currently delivering a different service. Assuming there are no services being recommended to be discontinued, this report will presume new additional resources would be added at a cost for the enhanced service.
23. Any increase in service cost could be recovered in whole or in part by service fees. Any costs not recovered by service fees would have to be recovered from the property tax levy. The financial implications will be discussed at the end of this report.
24. Every service provided by the City is expected to provide a benefit to the community. Council's request indicates two potential benefits;
 - (a) Protecting the safety of the occupants of an unlicensed BLR, and
 - (b) Reducing the nuisances attributed to high-occupant licensed BLRs such as vehicle congestion, excessive noise and poorly maintained properties.

Are Unlicensed BLRs Unsafe for the Occupants?

25. The safety standards for the construction of a building are contained in the Ontario Building Code and the Ontario Fire Code. The Codes contain prescribed requirements for early warning systems (smoke alarms, CO alarms), exits from the building, and any special requirements for fire-retardant building materials. The construction standards for BLRs, as defined by the Codes, are more stringent than for a regular dwelling unit.
26. The complexity lies within the definition of how the Codes define a BLR. It differs from the definitions in our municipal Zoning By-law in that regardless of the number of tenants, a house continues to be a single dwelling unit as long as the tenants residing in the house operate as a single housekeeping unit. The Code definitions were changed in 2012 to remove the reference to "domicile" in the definition of a dwelling unit. A domicile refers to a place of permanent residency, so a dwelling unit no longer needs to be the permanent residence of the occupants. Several court decisions have also concluded that the occupants, if operating as a single housekeeping unit, would be regarded as a dwelling unit and not a BLR even if the number of tenants exceeded 4.
27. Whereas most of the homes described as a BLR under our Zoning By-law are still considered to be a single dwelling unit under the Codes, no construction upgrades are required and the house is considered to be just as safe as any house occupied by what many would call a traditional family.
28. The ability to determine if a group of individuals living together in a house are not operating as a single housekeeping unit would be extremely difficult. Examples would include advertisements by the owner to rent out each room individually with no input from the other tenants, locks on kitchen cupboards for the exclusive use of each tenant, and/or the landlord providing furniture and cleaning services for all common areas.
29. As indicated earlier, an inspection of the inside of the dwelling plus reliable information obtained from the house occupants would be required to determine if an occupancy was such that building construction upgrades would be required by the Building Code or Fire Code.

Will Licensed BLRs Ensure More Compliant Behaviour of the Occupants?

30. Noise, poor property maintenance and too many cars clogging the property and the adjacent streets are issues many neighbours raise when they suspect a house is a BLR. Their hope is that the licensing process will obligate the owner to exercise better controls over their tenants' behaviour.
31. Currently, property maintenance and cars being parked on the front lawn of a home are enforceable by By-law Services staff either by receipt of a complaint, or through observations made by By-law Officers when conducting their parking patrols. Both types of violations are the responsibility of the property owner. While it may take a significant amount of staff resources, staff are eventually able to convince the property owner to provide better supervision and care of their property to avoid service fees and court fines for these by-law contraventions committed by their tenants.
32. Where front yard parking and poor property maintenance issues such as excessive garbage and debris result in service fees and charges against the property owner, the owner will often address the issue by the eviction of any problem tenants.
33. Too many cars parking on the street too close to driveways is a By-law contravention enforced by complaint only as per the instructions from a previous Council. This contravention results in a ticket being issued against the owner of the vehicle. Even the owner of the property and driveway could get a ticket for parking their car too close to their own driveway if a complaint is submitted.

34. Noise complaints, usually associated with late night parties occurring at a residence, are investigated by the police upon receipt of a complaint, and only if on-duty resources are available to attend to what is considered to be a neighbourhood nuisance. Often if alcohol and large crowds are involved, the police simply ask that the noise be lowered.
35. The primary added features of the licensing requirement are ensuring the owner maintains liability insurance, and having the owner arrange for annual inspections of the property to ensure the interior conditions of the house are compliant with the property maintenance by-law and the Fire Code.
36. Staff do not believe the requirement for a BLR license has much impact on the owner's oversight of the occupant's behaviour.

What Would It Cost to Enhance By-law Enforcement Efforts?

37. To increase efforts to find and confirm where other unlicensed BLRs might be located will incur a cost for the extra staff.
38. The number of investigation files per year could be doubled at a cost of approximately \$48,000. The added outcomes would probably be 60 more tenants looking for a new place to live and 6 newly licensed BLRs. There's a risk the rents for all remaining tenants may be increased to cover the reduced tenants and the extra costs incurred by the landlord.
39. There would be a reduction of vehicle congestion at the homes converted back to single dwelling units due to the reduced occupancy.
40. To break even, the \$48,000 cost would need to be recovered from the 6 newly licensed BLRs at a cost of \$8,000 each.

What About the RM2 Zones?

41. Council had enquired specifically about BLRs located in RM2 Zones. In this Zone, there is no spatial separation requirement for Small BLRs, thereby allowing them to be located on adjacent properties.
42. Maps for each ward have been attached to this report showing the parcels within the designated RM2 Zones. Ward 2 contains six times the number of RM2 land parcels than the average of all the other wards, and contains all six of the licensed BLRs that are located within an RM2 Zone. The six licensed BLRs are currently well separated from each other.
43. No further analysis of the RM2 Zones is warranted at this time. The issues of finding unlicensed BLRs and forcing them to comply with the municipal regulations and the Building and Fire Codes are the same as already discussed above.

In Summary

44. The City currently has 26 licensed BLRs located in the city, all of them located in Wards 1 and 2.
45. Of an average 75 BLR complaint investigations occurring each year, 35 were confirmed to be single dwelling units, and 30 were found to be unlicensed BLRs. Of the 30 unlicensed BLRs, 24 were converted back to a single dwelling unit by the eviction of the extra tenants, and only 6 became a licensed BLR.
46. The extra cost of enhanced enforcement is very expensive for the benefits that might be gained.

ENVIRONMENTAL MATTERS

There are no environmental matters related to the recommendation.

ALTERNATIVES

The following alternatives are available for consideration by General Committee:

Alternative #1 General Committee could maintain the existing service level for investigations of alleged unlicensed BLRs. (i.e. Status Quo)

This alternative is not recommended as it limits the authority for staff to watch and monitor "Rooms for Rent" ads to expand their investigations list if and when the existing resources have some available capacity.

Alternative #2 General Committee could alter the proposed recommendation by asking staff to include the hiring of additional staff resources in the 2017 Business Plan and Budget to enhance the by-law enforcement efforts for alleged unlicensed BLRs.

Although this alternative is available, it would need to be considered with all other budget pressures during the Budget approval process.

Alternative #3 General Committee could alter the proposed recommendation by amending the definition of a Boarding Lodging Rooming House in the Zoning By-law and the Licensing By-law to align with the definition in the Ontario Building Code and Fire Code.

Although this alternative is available, it would reduce the number of licensed BLRs to about 4 where the tenants simply each rent a room and do not operate as a single housekeeping unit. There would be some extra capacity made available for the enforcement of other by-laws including the Zoning By-law and the Property Standards By-law.

FINANCIAL

No additional staff resources will be required to implement the staff recommendation. Increasing enforcement activities would require additional staff resources.

LINKAGE TO 2014-2018 STRATEGIC PLAN

The recommendation(s) included in this Staff Report support the following goals identified in the 2014-2018 Strategic Plan:

- Responsible Spending

Based on a cost and benefit analysis, the cost of an enhanced by-law enforcement service for finding unlicensed BLRs does not result in significant benefits for the community.

APPENDIX "A"

Maps of Each Ward Showing Locations of BLRs and Two-unit Houses

Ward 1 BLR & Two Unit Housing Totals



- WARD BOUNDARY - WARD 1
- RESIDENTIAL ZONING (4552 PARCELS IN WARD 1)
- TWO UNIT HOUSING (141 PROPERTIES IN WARD 1)
- BLR (16 PROPERTIES IN WARD 1)
- City Boundary
- Parcels

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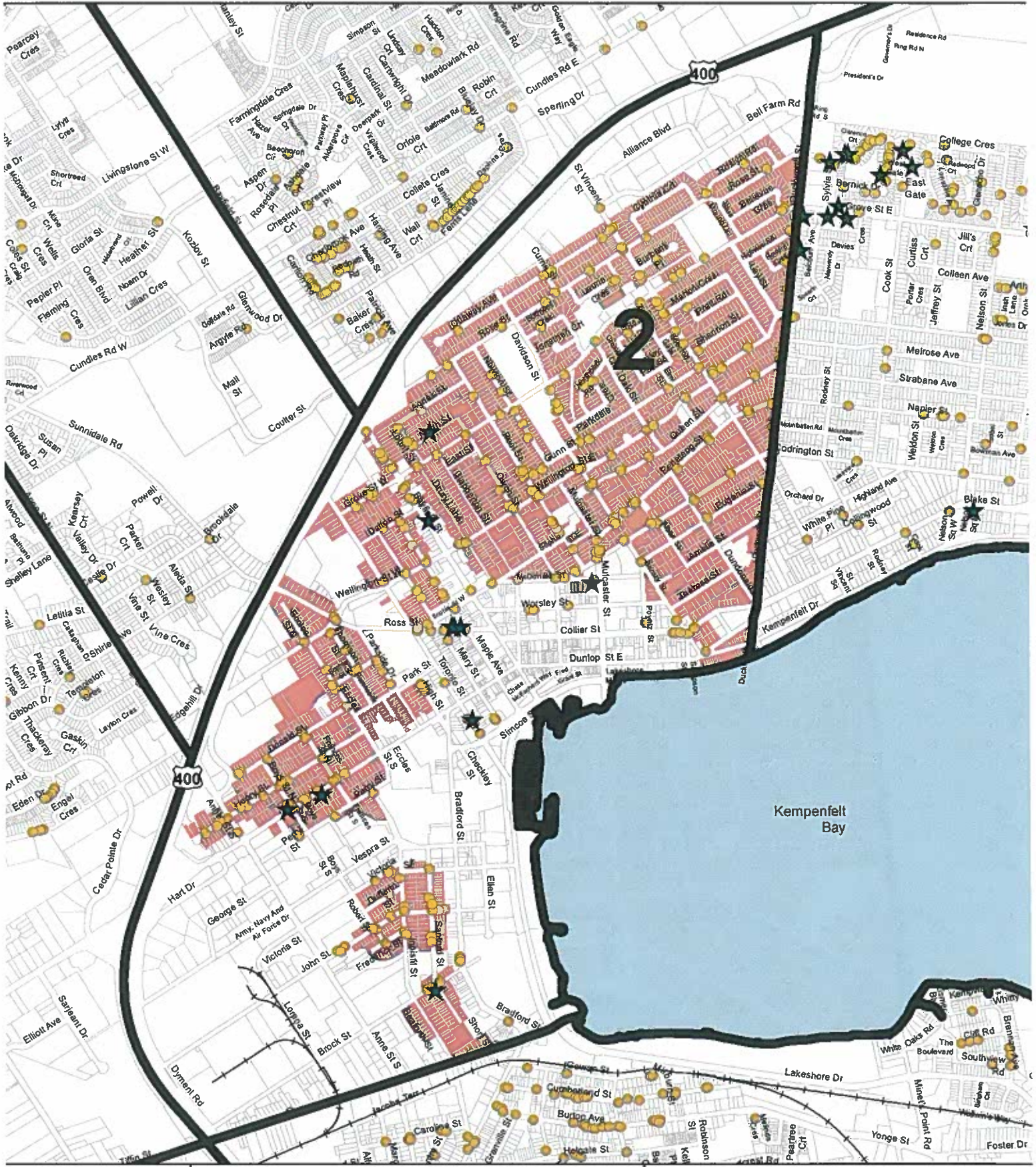
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Ward 2 BLR & Two Unit Housing Totals



- WARD BOUNDARY - WARD 2
- RESIDENTIAL ZONING (3233 PARCELS IN WARD 2)
- TWO UNIT HOUSING (286 PROPERTIES IN WARD 2)
- BLR (10 PROPERTIES IN WARD 2)
- City Boundary
- Parcels

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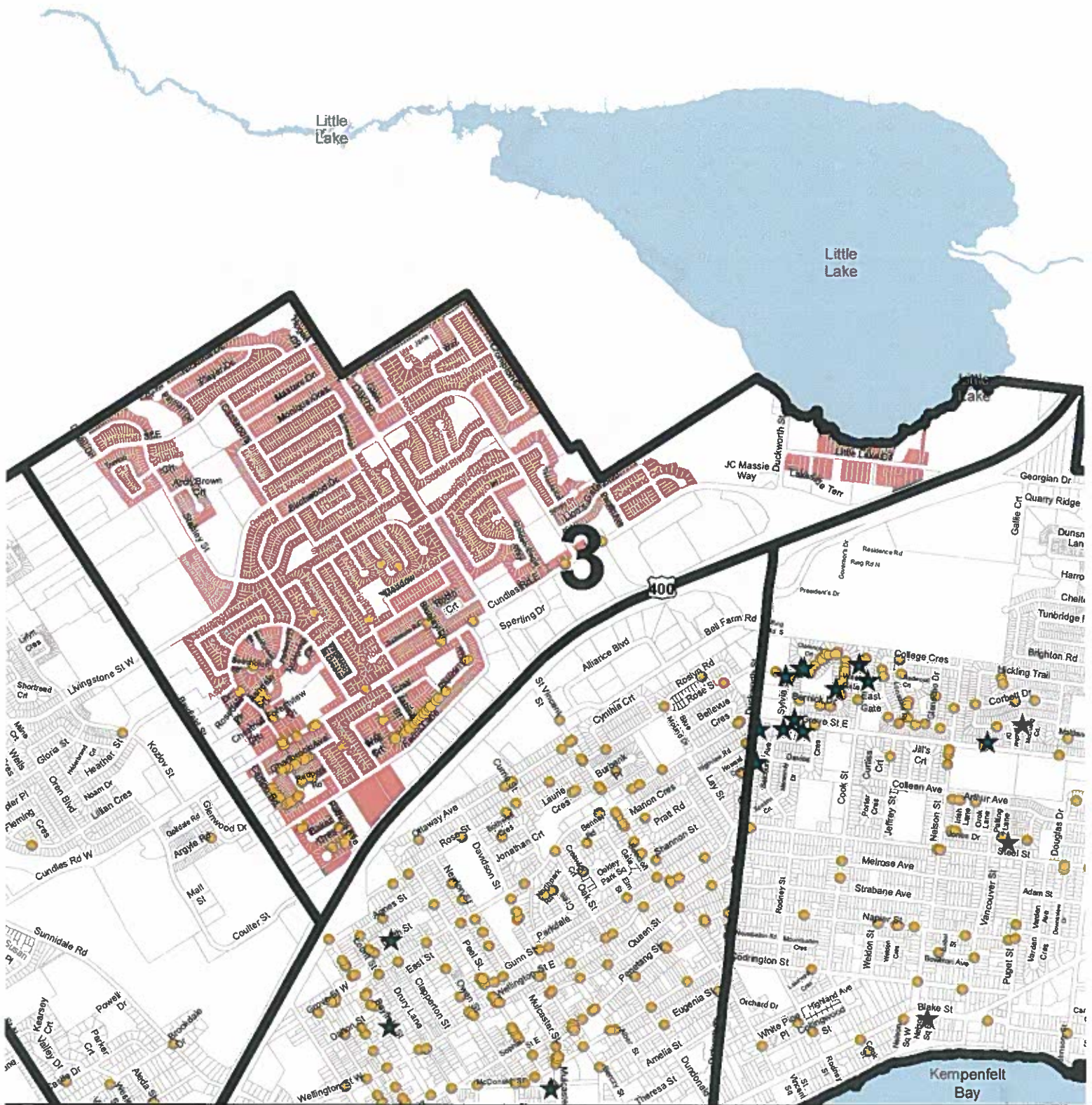
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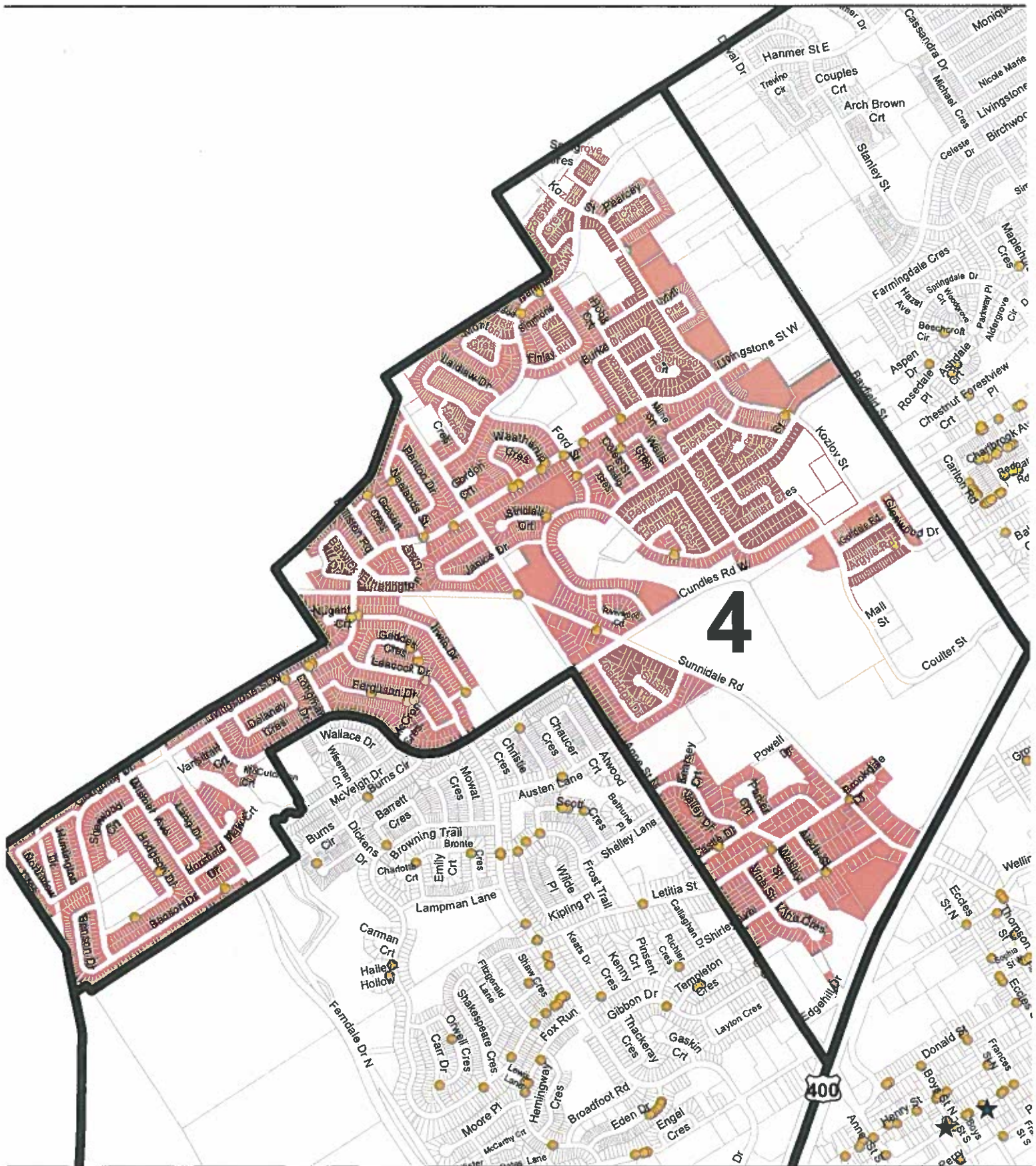
Ward 3 BLR & Two Unit Housing Totals



- WARD BOUNDARY - WARD 3
- RESIDENTIAL ZONING (3963 PARCELS IN WARD 3)
- TWO UNIT HOUSING (69 PROPERTIES IN WARD 3)
- BLR (0 PROPERTIES IN WARD 3)
- City Boundary
- Parcels



Ward 4 BLR & Two Unit Housing Totals



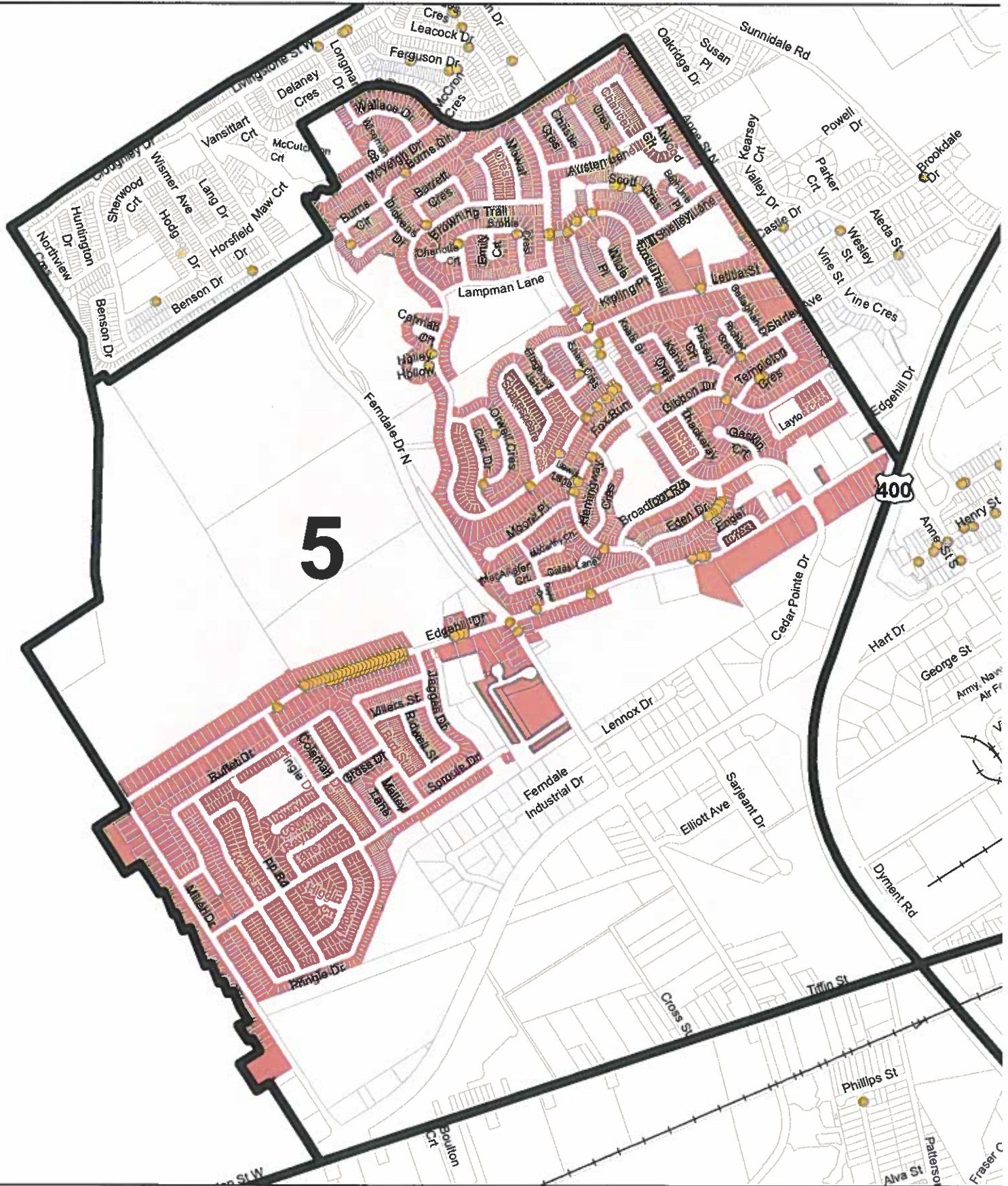
- WARD BOUNDARY - WARD 4
- RESIDENTIAL ZONING (3615 PARCELS IN WARD 4)
- TWO UNIT HOUSING (43 PROPERTIES IN WARD 4)
- BLR (0 PROPERTIES IN WARD 4)
- City Boundary
- Parcels







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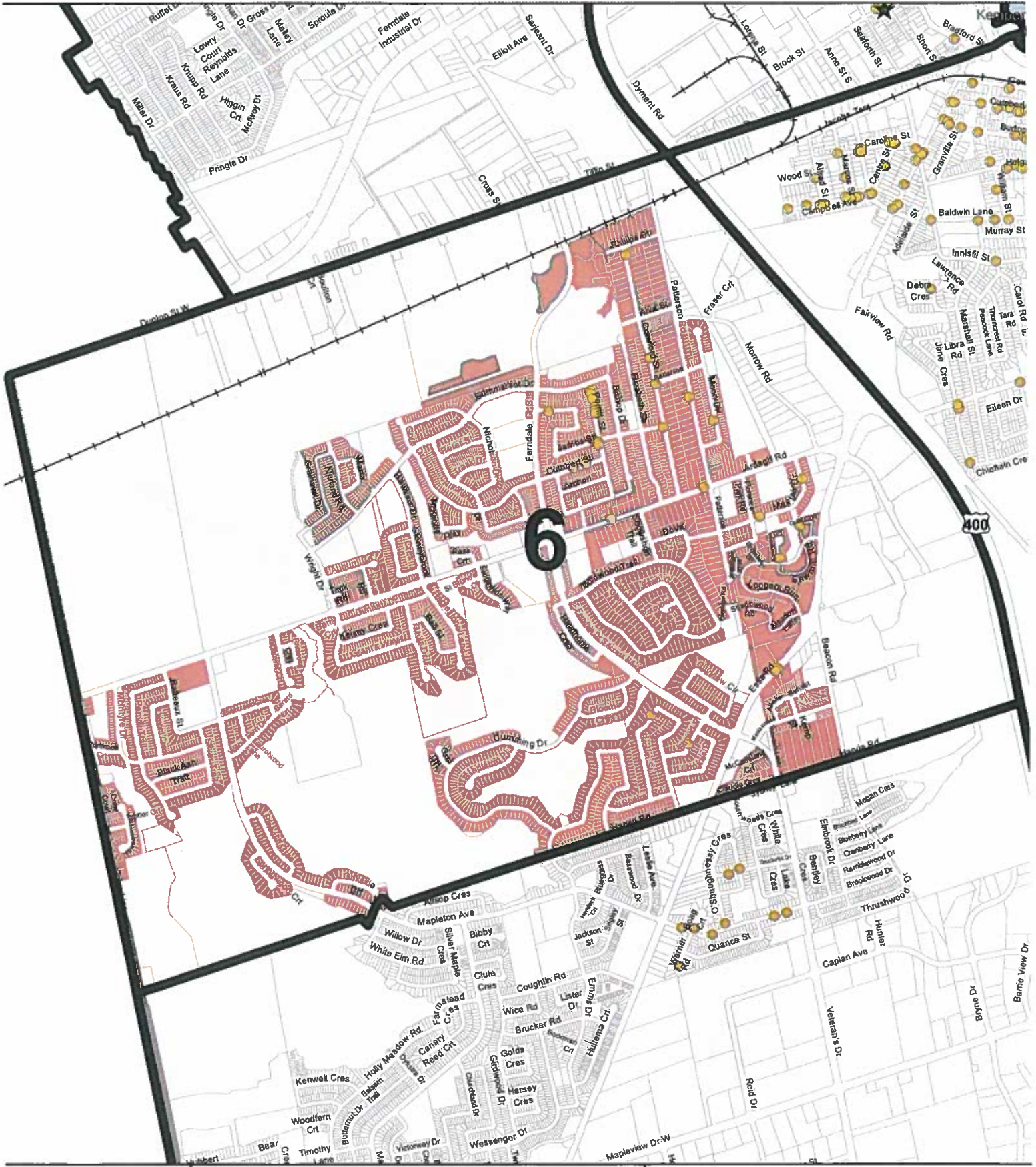
Ward 5 BLR & Two Unit Housing Totals



-  WARD BOUNDARY - WARD 5
-  RESIDENTIAL ZONING (3862 PARCELS IN WARD 5)
-  TWO UNIT HOUSING (107 PROPERTIES IN WARD 5)
-  BLR (0 PROPERTIES IN WARD 5)
-  City Boundary
-  Demarc



Ward 6 BLR & Two Unit Housing Totals



- WARD BOUNDARY - WARD 6
- RESIDENTIAL ZONING (4161 PARCELS IN WARD 6)
- TWO UNIT HOUSING (28 PROPERTIES IN WARD 6)
- BLR (0 PROPERTIES IN WARD 6)
- City Boundary
- Parcel







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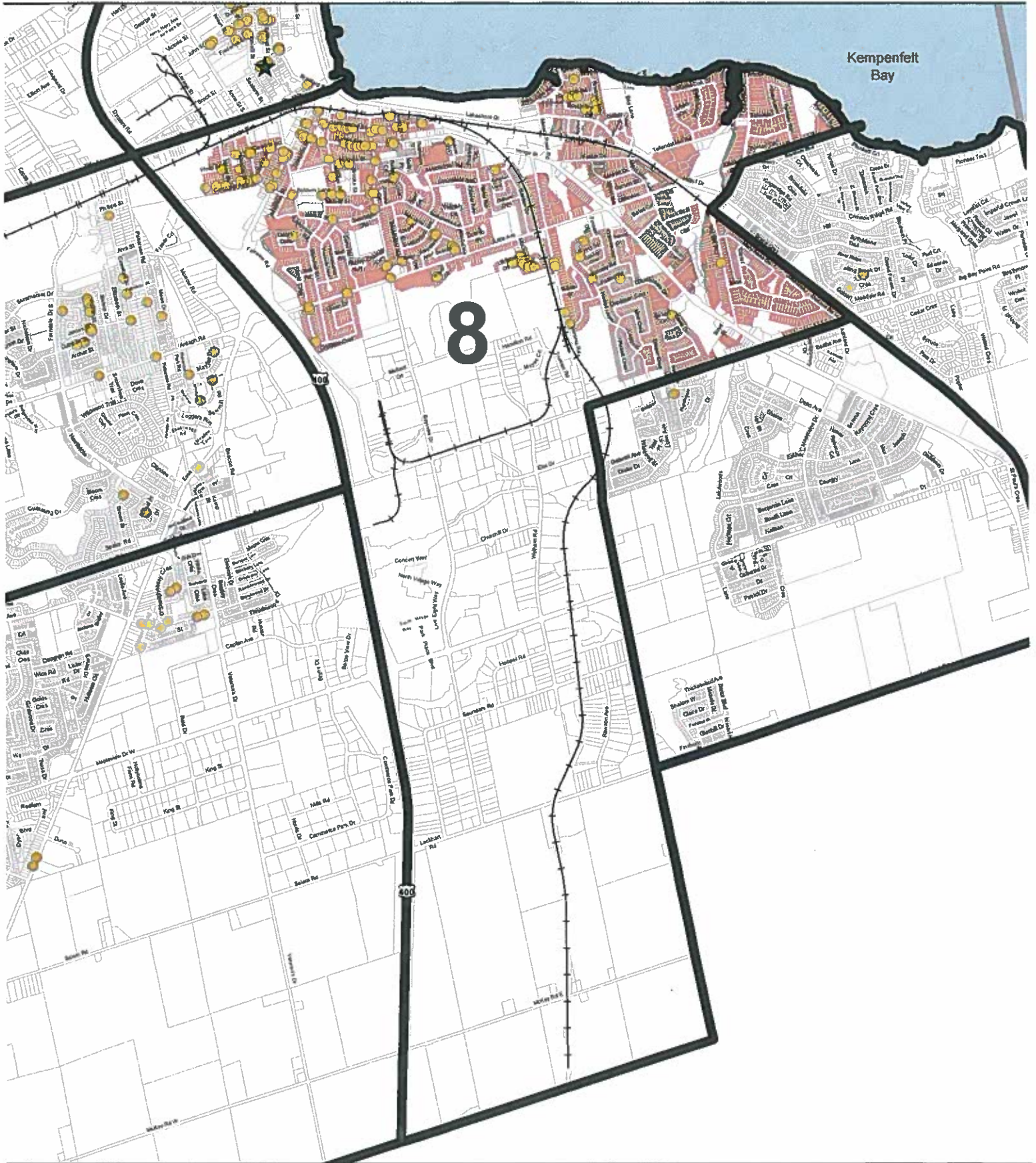
Ward 7 BLR & Two Unit Housing Totals



-  WARD BOUNDARY - WARD 7
-  RESIDENTIAL ZONING (4802 PARCELS IN WARD 7)
-  TWO UNIT HOUSING (11 PROPERTIES IN WARD 7)
-  BLR (0 PROPERTIES IN WARD 7)
-  City Boundary
-  Dumfries









Ward 8 BLR & Two Unit Housing Totals

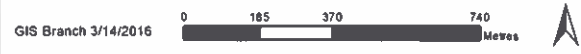


- WARD BOUNDARY - WARD 8
- RESIDENTIAL ZONING (4589 PARCELS IN WARD 8)
- TWO UNIT HOUSING (133 PROPERTIES IN WARD 8)
- BLR (0 PROPERTIES IN WARD 8)
- City Boundary
- Parks

Ward 9 BLR & Two Unit Housing Totals



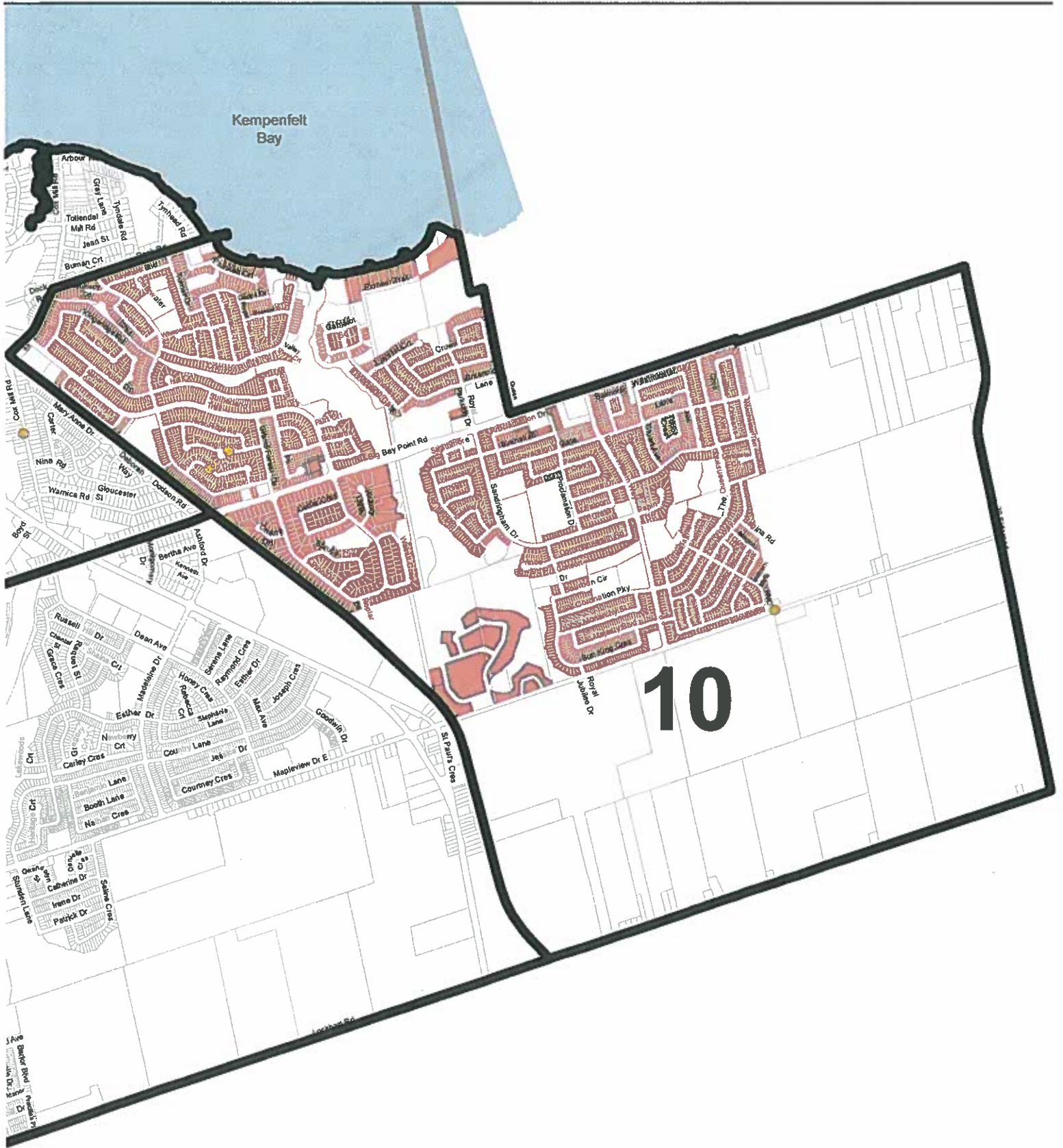
-  WARD BOUNDARY - WARD 9
-  RESIDENTIAL ZONING (3234 PARCELS IN WARD 9)
-  TWO UNIT HOUSING (1 PROPERTIES IN WARD 9)
-  BLR (0 PROPERTIES IN WARD 9)
-  City Boundary
-  Parcels



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Ward 10 BLR & Two Unit Housing Totals









- WARD BOUNDARY - WARD 10
- RESIDENTIAL ZONING (4591 PARCELS IN WARD 10)
- TWO UNIT HOUSING (3 PROPERTIES IN WARD 10)
- BLR (0 PROPERTIES IN WARD 10)
- City Boundary
- Parcels

APPENDIX "B"

Maps of Each Ward Showing Locations of BLRs and Two-unit Houses in RM2 Zones

Ward 1 BLR & Two Unit Housing in RM2 Zoning



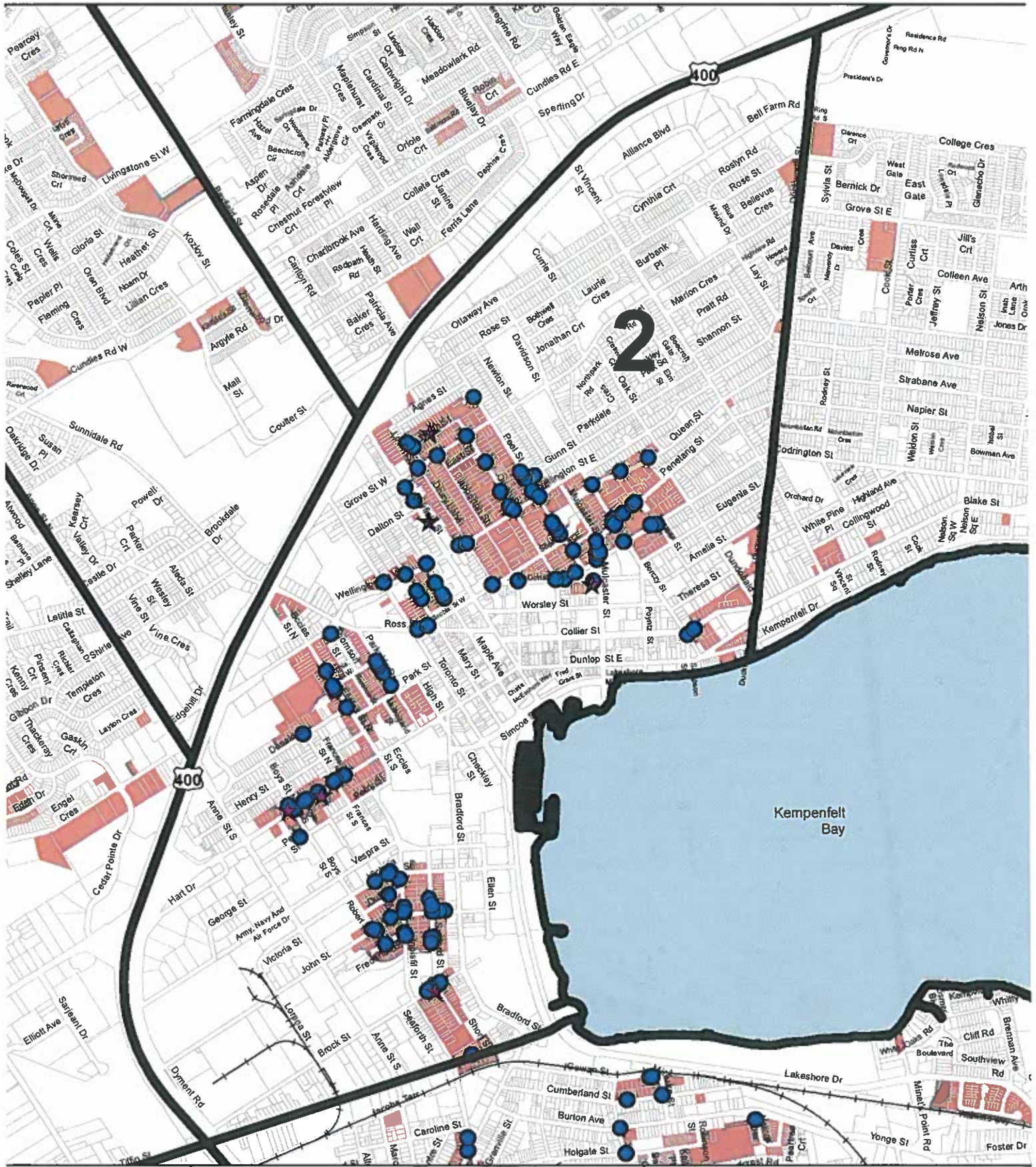
-  WARD BOUNDARY - WARD 1
-  RM2 ZONING (94 PARCELS IN WARD 1)
-  TWO UNIT HOUSING IN RM2 ZONE (4 PROPERTIES IN WARD 1)
-  BLR IN RM2 ZONE (0 PROPERTIES IN WARD 1)
-  City Boundary
-  Water



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Ward 2 BLR & Two Unit Housing in RM2 Zoning



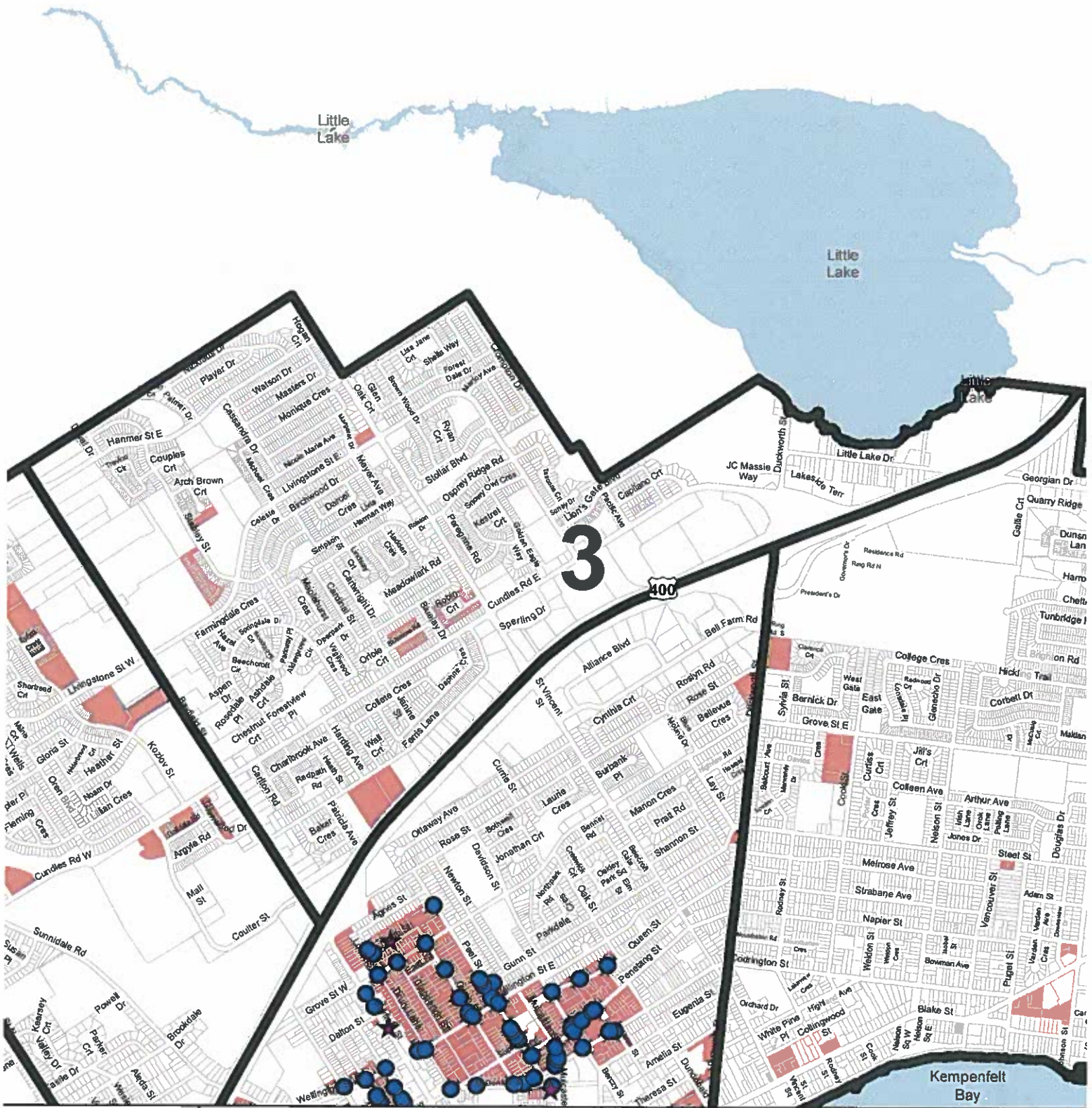
- WARD BOUNDARY - WARD 2
- RM2 ZONING (1137 PARCELS IN WARD 2)
- TWO UNIT HOUSING IN RM2 ZONE (107 PROPERTIES IN WARD 2)
- BLR IN RM2 ZONE (6 PROPERTIES IN WARD 2)
- City Boundary
- Parcels



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Ward 3 BLR & Two Unit Housing in RM2 Zoning



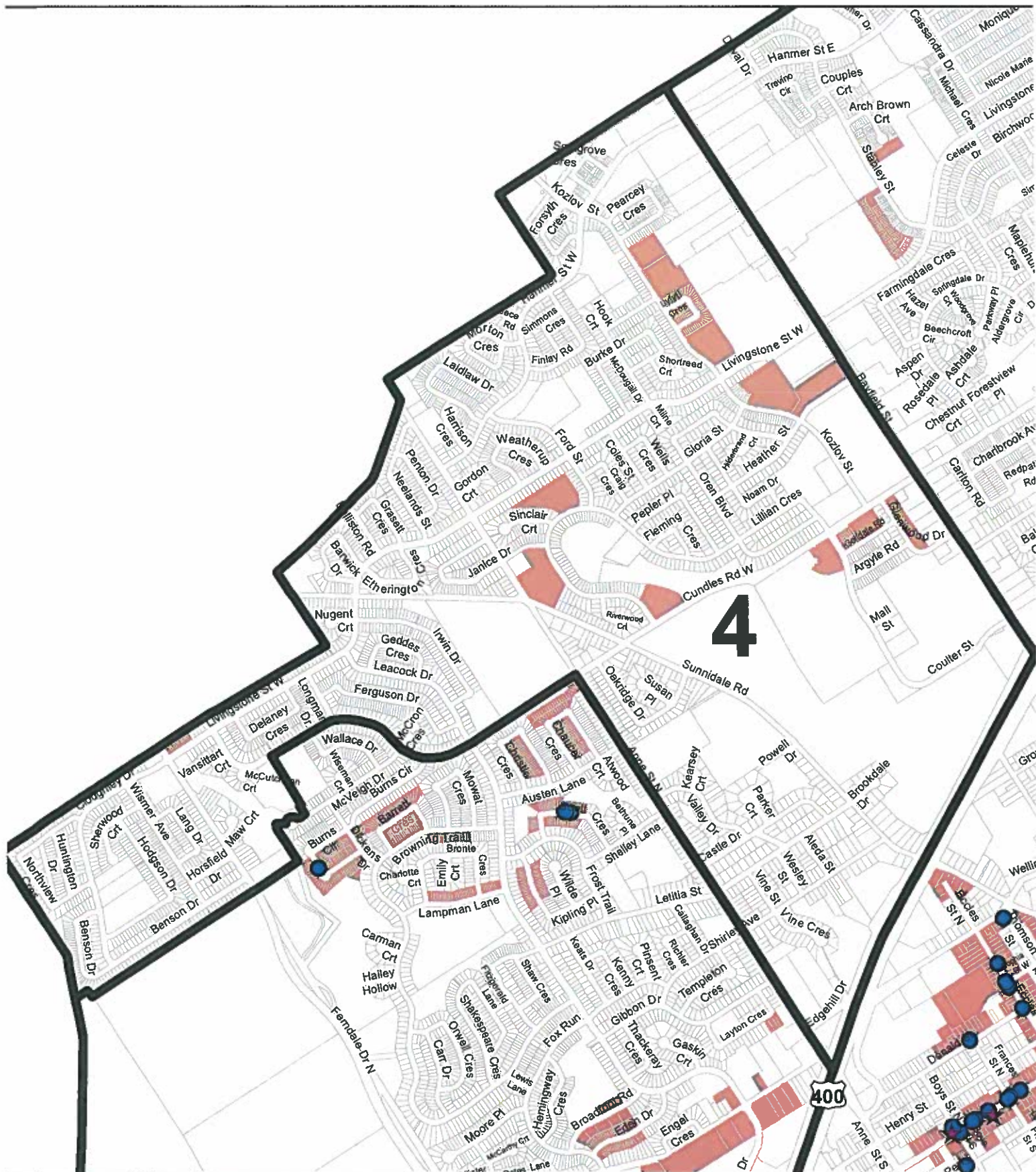
- WARD BOUNDARY - WARD 3
- RM2 ZONING (157 PARCELS IN WARD 3)
- TWO UNIT HOUSING IN RM2 ZONE (0 PROPERTIES IN WARD 3)
- BLR IN RM2 ZONE (0 PROPERTIES IN WARD 3)
- City Boundary
- Demarcation



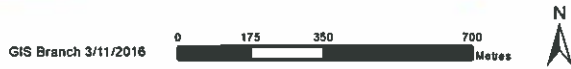
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Ward 4 BLR & Two Unit Housing in RM2 Zoning



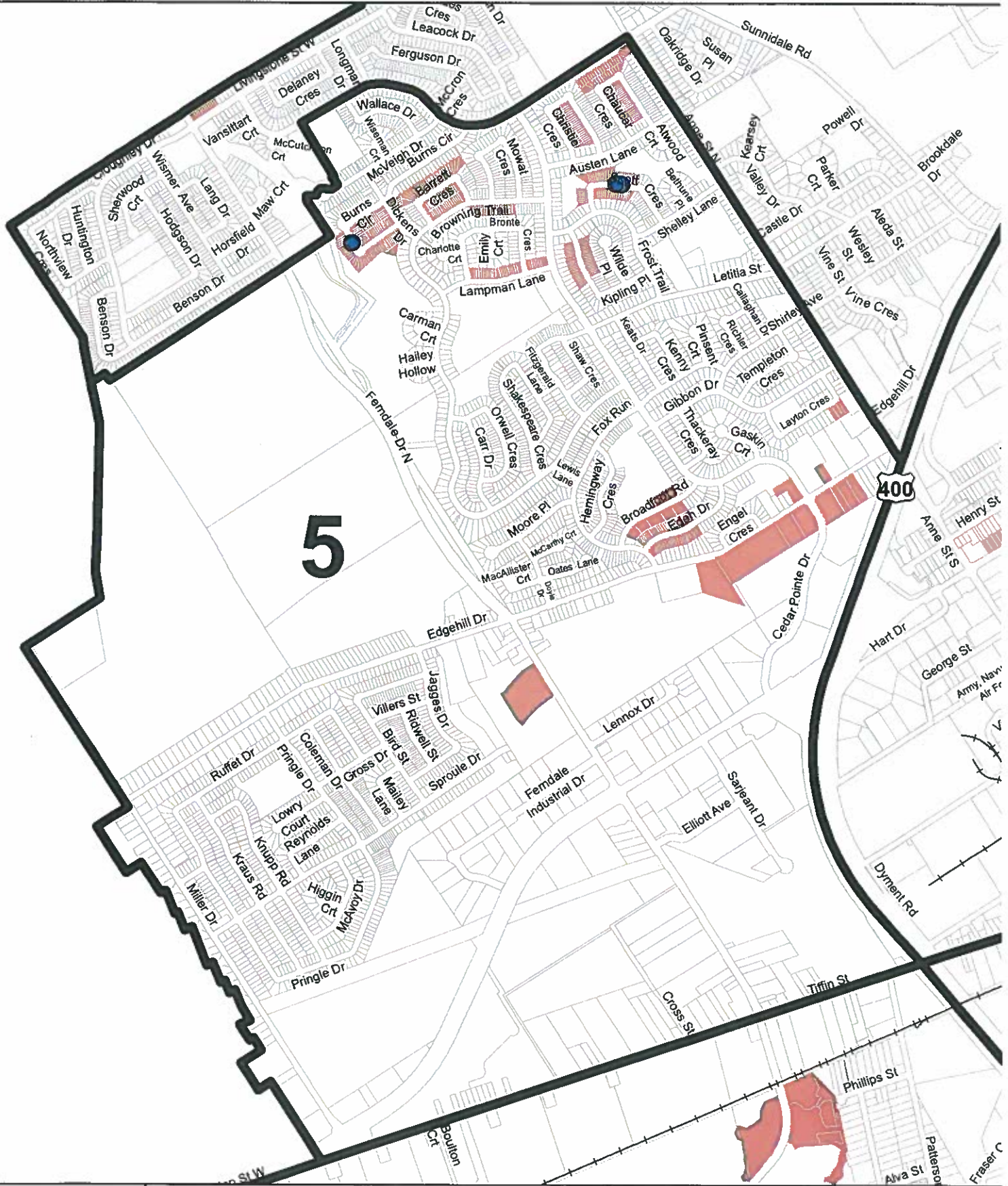
- WARD BOUNDARY - WARD 4
- RM2 ZONING (103 PARCELS IN WARD 4)
- TWO UNIT HOUSING IN RM2 ZONE (0 PROPERTIES IN WARD 4)
- BLR IN RM2 ZONE (0 PROPERTIES IN WARD 4)
- City Boundary
- Parcels









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Ward 5 BLR & Two Unit Housing in RM2 Zoning



-  WARD BOUNDARY - WARD 5
-  RM2 ZONING (479 PARCELS IN WARD 5)
-  TWO UNIT HOUSING IN RM2 ZONE (3 PROPERTIES IN WARD 5)
-  BLR IN RM2 ZONE (0 PROPERTIES IN WARD 5)
-  City Boundary
-  Demarcate

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Ward 6 BLR & Two Unit Housing in RM2 Zoning



- WARD BOUNDARY - WARD 6
- RM2 ZONING (135 PARCELS IN WARD 6)
- TWO UNIT HOUSING IN RM2 ZONE (2 PROPERTIES IN WARD 6)
- BLR IN RM2 ZONE (0 PROPERTIES IN WARD 6)
- City Boundary
- Parcel









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Ward 7 BLR & Two Unit Housing in RM2 Zoning



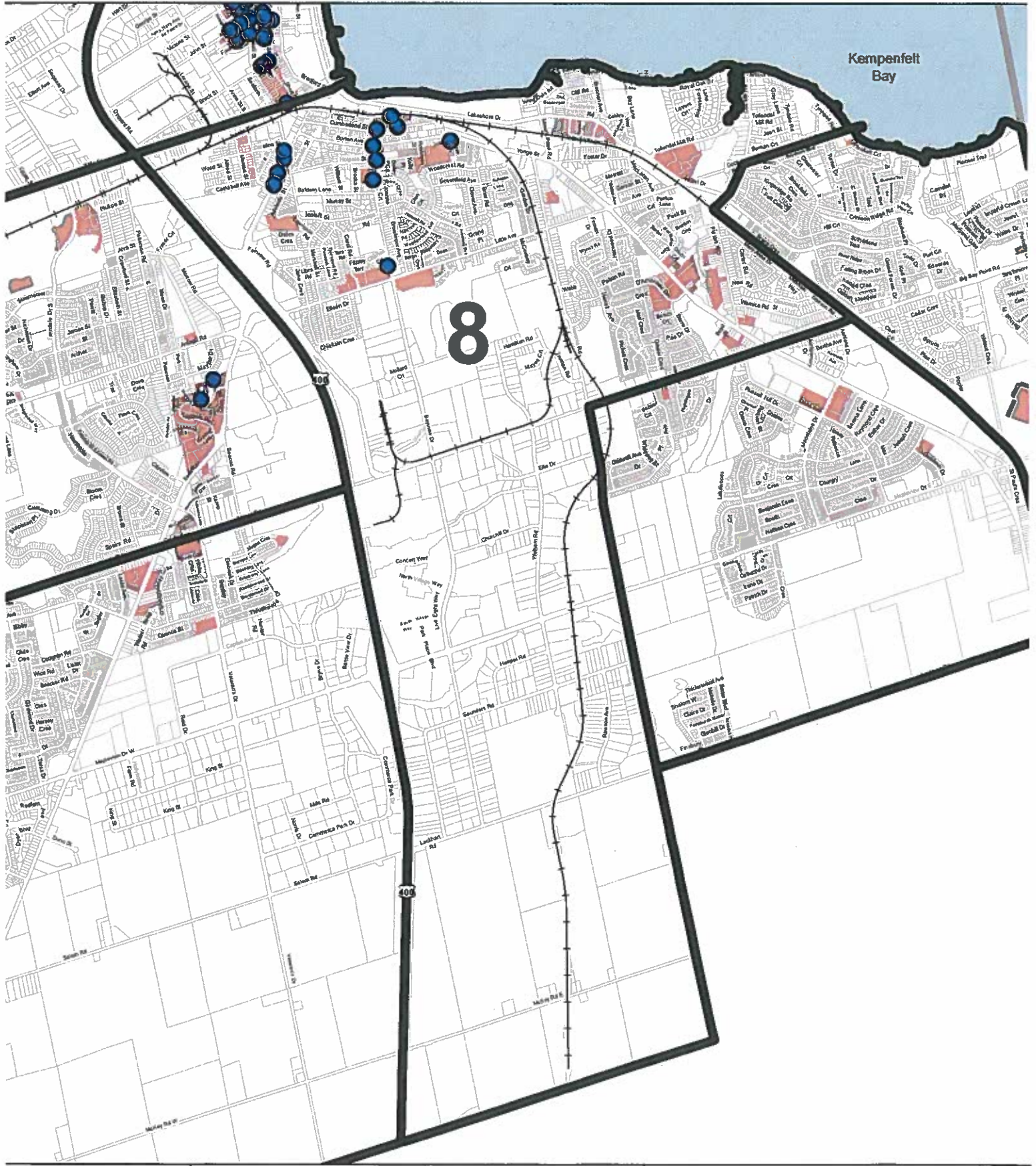
-  WARD BOUNDARY - WARD 7
-  RM2 ZONING (241 PARCELS IN WARD 7)
-  TWO UNIT HOUSING IN RM2 ZONE (0 PROPERTIES IN WARD 7)
-  BLR IN RM2 ZONE (0 PROPERTIES IN WARD 7)
-  City Boundary
-  Demolish







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Ward 8 BLR & Two Unit Housing in RM2 Zoning



-  WARD BOUNDARY - WARD 8
-  RM2 ZONING (357 PARCELS IN WARD 8)
-  TWO UNIT HOUSING IN RM2 ZONE (13 PROPERTIES IN WARD 8)
-  BLR IN RM2 ZONE (0 PROPERTIES IN WARD 8)
-  City Boundary
-  Parcel



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