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**To:** [Economic and Community Development](#)  
**Subject:** Submission for Oc 21 Meeting  
**Date:** October 20, 2021 2:52:21 PM  
**Attachments:** [ECDCPresentOc21,21.docx](#)

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I enclose my submission.  
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## **PRESENTATION of A. Ferranti to ECDC Meeting: Oc 21, 2021 9:30**

My thanks to SSHA staff for supplying me with this Committee's Agenda for its Oc 21 meeting and the presentation portal embedded in it. I wish to comment upon this Committee's item EC25.6: SSHA's Report for Action dated Oc 6, 2021 ('22 Shelter Infrastructure Plan, Community Engagement and Contract Amendments and Purchase Orders) and the underlying Report of the BGM Report dated May 12, 2021.

My comments are directed to the parts of the SSHA and BGM Reports that relate to community engagement around the siting of homeless shelter decisions made by senior administration.

Accountability and transparency in municipal governance is statutorily guaranteed by the Preamble ('the City...exercises its powers in a responsible and accountable fashion') and s. 131(e) ('City Council shall ensure the accountability and transparency of the City's operations, including the activities of the City's senior management') of the *City of Toronto Act, 2006*. And the common law (the *Nicholson* and *Baker* decisions of the Supreme Court of Canada), working hand-in-hand with the legislative provisions above, imposes procedural safeguards by which accountability and transparency are satisfied, chief among them the right of those whose interests are directly affected, such as the immediate neighbours of those shelters, to be heard by the administrative decision-maker in advance of the decision being made.

Judged against those legal requirements, the single biggest deficiency in the City's current community engagement process relative to the siting of homeless shelters is Council's decision in April 2017 (CD-19.6) to exempt itself, and those senior administrators to whom it delegated authority, from the legally-mandated accountability and transparency requirements. It purported to do so on the basis of an 'expert third party (Public Progress Inc.)' recommendation. That consultant did not consider whether the exemption proposed was violative of the statutorily- and common law-guaranteed accountability and transparency requirements. Moreover, having no legal expertise, it was not qualified to engage that consideration. The City's Solicitor's opinion on such an exemption was not solicited apparently.

This was a politically-driven and cynical move designed to silence all those who may have stood in opposition to the siting decision. It relied on a stereotypical depiction of immediate neighbours as discriminatory and unempathetic and not sufficiently understanding the plight of the homeless, having nothing meaningful to contribute. I cannot imagine a greater elitist and authoritarian and undemocratic and paternalistic mindset than that. The exemption put in place in April 2017 reversed a well-functioning fully-open community engagement process in place for 14 years, since 2003.

And, clearly, the exemption from the practice of receiving public input in advance of shelter siting decisions enacted in April 2017 was not forced upon the city by any 'compressed timelines', such as those that were used to justify exempting public input in advance of the siting decisions made during the second covid wave in late 2020, such as the Novotel siting (BTW, I don't believe that the timelines were then so compressed that they justified shutting out

immediate neighbours). So, it can't use the pandemic as an excuse for depriving immediate neighbours of public input in advance of a siting, as it did with respect to the Novotel siting.

Some city staff and affected stakeholders, to their credit, expressed dissatisfaction in 2020 with the new community engagement process. As a result, a 'comprehensive review' of the community engagement process around the siting of homeless shelters was promised that, in the words of the BGM Report, 'would encourage a broader view of engagement through the full life-cycle of the siting process, including the decision over particular sites, a virtuous cycle that positively impacts community engagement for new sites'. It was undertaken in October 2020 by BGM. That was my first indication that the 'comprehensive review' would not be as comprehensive as advertised. BGM had done the September 2020 Report (for SSHA and United Way jointly) which was adopted by Council in October 2020. In it, BGM elided over the April 2017 exemption. More than that, it went out of its way to laud the exemption and to note how successful it had been implemented over the previous 3 years. Certainly, for city administrators and Councillors intent on silencing public input on siting decisions, it was a success. Not so much for the public, their constituents.

BGM simply reinforced the city's 2017 commitment to cut the public out over its siting decisions: an insidious feedback loop if there ever was one. That is the reason SSHA engaged BGM in the first place, I suspect: because it has signaled its alignment with already established policy, BGM could be counted on to produce the report SSHA wants. And SSHA, in turn, can be counted on to make the recommendations Council wants. Is there anyone there who sees this cozy echo chamber effect as a problem, as in a problem for ensuring that reviews are independent and, in their comprehensiveness, give a more diverse assessment?

BGM did not disappoint. The result was preordained. In its May 2021 Report, it again elided over the legality, and the wisdom, of the public input exemption; and went on, again, to both praise it and comment on its success over the previous, now, 4 years. In fact, it proclaimed the exemption as a 'step forward in SSHA's mission'.

Among other things, BGM's Report is incoherent and contradictory. It acknowledges the 'importance of open and authentic community engagement when new services are introduced' and how 'valuable public input is', on the one hand, and then endorses the silencing of the kind of open and authentic community engagement that it considers valuable and professes to be in favour of. A comprehensive review, all right, but in the narrowest senses possible', don't you think? This is the result when one acts upon a 'virtuous' impulse to achieve a virtuous end, the unlawful means be damned.

BGM acknowledges the 'anxieties (from immediate neighbours) related to (historical) nearby siting'. These 'anxieties' are caused by 'externalities', the Report says. Such language strips the reality of all descriptive force and meaning, and is an attempt to minimize the impact of that reality. That's a rhetorical trick used by someone bent on advancing a political project. BGM can't even bring themselves to say the words: assaults, threats, intimidation, rampant (illegal) drug use and dealing, property destruction and defacements. Let's call these things for what they are: rage at the crime and disorder unleashed upon the affected neighbourhood, which the yellow

jackets, an incapable community safety force and no more than a symbolic show of community safety are unable to contain.

That is not my assessment, although I agree with it. It is the assessment of a senior Division 51 official with intimate and first-hand knowledge of the situation. He described the Novotel as a 'localized hot spot of crime and disorder which has overwhelmed fire and police and medical services'. It wasn't until 2 police officers were stationed at the Novotel a month ago that the extent of the mayhem (being recorded on a daily basis on running reports sent to Councillors and the Mayor) subsided.

I note that BGM interviewed this Division 51 official in the preparation of its Report, but seemingly incorporated none of his assessment into it. Why? Wait I know: because, like the April 2017 exemption, it doesn't fit with what BGM, and SSHA, want to accomplish. The comments BGM received from the 19 focus group members who were residents with experience of shelters in their neighbourhood fall into the same category. Where is their commentary?

The BGM Report noted that there was 'no shared understanding at City Hall or outside of what community engagement is intended to achieve'. This lack of shared understanding and 'different views of transparency... among the general public... creates frustration and mistrust, especially in downtown neighbourhoods where shelters are concentrated'. And this frustration and mistrust has 'strained relations between Councillors and their constituents'. We can't have strained relations, God forbid.

It is clear that the only 'improvements and enhancements' to community engagement around the siting of shelters that the BGM Report was enlisted to consider were limited to the period 'between purchase (the acquisition or lease of a site location already decided upon) and opening', that is, not including the siting decision stage. This is the limit of the transparency that it produced. Such an impoverished view of transparency if ever there was one. To 'build on but not to supplant' the April 2017 exemption to public input, it said.

Not only that, but its intent was to make community engagement serve the sole function of preparing the ground in affected neighbourhoods for the shelter, already decided upon, coming their way. To lay the groundwork for a shelter the neighbourhood had no hand in deciding upon, to soften it up, to massage it. To dampen the perceived opposition. To reduce the fallout Councillors will be subjected to (as reflected in 'the evaluations of residents' opposition to previous first covid wave shelter sitings).

Using, the Report recommends, a 'targeted, customized, one-way (in the direction of residents), community engagement strategy that seeks to leverage a Councillor's particular knowledge of key 'leaders in the affected neighbourhood', in other words, those supportive of the siting decision already made.

The strategy, using standardized material that emphasizes the homeless' right to housing, a right no provincial or federal government, reflecting the wishes of its citizens, has yet deigned to incorporate into legislation, is intended to stress, for greater understanding, the plight of the homeless and the city's plans to address it. The idea is to make the immediate neighbours more

'Welcom(ing) of New Shelters'. It is intended to instill a sunny disposition among those immediate neighbours who, unaware of the crime and disorder tsunami coming its way with shelters not incorporating real security cordons, had no say in the site's location. It is intended to 'soothe their (anticipated) anxieties', in the words of the Report. To make the siting to come more palatable to residents. Less inclined to complain to their Councillors. Because it's the Councillors' interests, not the interests of their constituent, that count.

The Report recommends training Community Engagement Facilitators better suited to implementing the new regime: actually, not much different from customized and targeted and limited-use community engagement that was recommended in Attach. 1 of the SSHA November 10, 2017 Report. Also to combat the 'misinformation (as to the effects of any one particular shelter siting) on 'neighbourhood Facebook home pages'. Let me tell you something: reporting upon the real impacts of shelters installed without a real safety perimeter is reality is not misinformation. Misinformation is the usual tag progressives use to discredit information inimical to their projects.

The BGM Report is the most cynical and manipulative exercise in political decision making I have seen in a long time. For all its supposed and prodigious intellect and wordsmithing, BGM offered the most bankrupt of suggestions for improving community engagement, such as they were. So many words to convey so many banal insights. Not much value for money there.

And, in converting BGM's 11 'insights' into 4 'improvements of its community engagement', no better Orwellian turn of phrase, SSHA has, in its Report for Action by this Committee, whole heartedly adopted its key findings. Its adoption of a CD24.7 protocol for Councillors' new community engagement roles, it reinforces, not mitigates. the adherence to the exclusionary community engagement policy in advance of siting decisions introduced in April 2017.

BGM and SSHA are wrong in attributing residents' frustration and anxiety over shelters to discrimination, racism, lack of empathy and insufficient understanding of the plight of the homeless. We, I, are, am, not any of those things. The frustration and anxiety relate to being shut out of the site-decision process. The level of frustration and anxiety becomes amplified by the insecurity to and of our persons (guaranteed to us as a constitutionally protected right) resulting from the failure or refusal to install an effective safety cordon around the shelter to protect us against the crime and disorder that inevitably follows, given the no abstinence-conditioned Housing First and harm reduction philosophies installed as operational models. Active users continue to use and deal in an open-air market. The seriously mentally ill, some of whom are prone to violence, are given unrestricted rein.

In installing a non-policing cordon of yellow jackets will satisfy your wish not to appear to be policing them, you have endangered the community. Women, some elderly, children and their parents who live next door are unsafe. And fear going out. BGM and SSHA don't even acknowledge this reality. Councillors never visit to show empathy and never denounce the mayhem. You know who you are. We feel as if we are not worthy of proper representation. This is the perspective of immediate neighbours, the one you laud as valuable, your April 2017 protocol shuts out and neglects. Give well-meaning residents such as me some credit for making

respectful representations on the initial siting decisions. So much for diversity (of perspective) and inclusion (of disaffected neighbours).

No amount of educative and standardized material on the plight of the homeless and targeted community engagement after the decision has already been made, as BGM and SSHA contemplates, will mitigate the frustration, at bottom, the rage, at top, of having been shut out.

I urge this Committee to reject any community engagement model for shelter siting that shuts out those most affected by the siting decision, its immediate neighbours, from engaging publicly in the initial siting decision. And urge this Committee to have the courage to recommend the restoration the 2003 community engagement regime, and to recommend the reversing of the April 2017 decision.