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To: [Planning and Housing](#)
Subject: Comments regarding proposed rentsafeTO changes
Date: December 8, 2020 1:29:33 AM

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Good evening,

I represent a private landlord of 127 residential units throughout Ontario with 37 of them being in the Toronto area. I would like to raise a few issues that come to mind with the recommended changes to the Apartment Building Standards program as well as some outstanding problems.

1. Firstly the requirement to display a score is very discriminatory in its nature. Areas of the city where housing standards are poor would be forced to display the poor quality of their homes. The intention is to create pressure on landlords to maintain better standards, but the actual effect would be shaming tenants. As the evaluations focus on many items that are cosmetic in nature, the program feels inconsiderate of tenants that require housing but prioritize affordability over appearance.
2. The program fails to incentivize landlords to maintain better housing standards. The truth is there is not enough housing in the city. Real competition is needed for landlords to begin even thinking about curb appeal and interior finishes. In this market with such low inventory and historically low vacancy rates, tenants are forced to take whatever they can get. A sign reminding them of the information they can already see about the state of the building is not going to deter them from renting. Have you ever been to an airport with a terrible food court and you're starving? The sad reality is you will probably eat something even knowing the food is substandard. That's the current state of the housing market in Toronto.
3. The implementation of the evaluations have been extremely subjective. There have been two evaluations at my building since the program started. In the time between the evaluations the only thing that had changed was a scheduled repair for a broken window was completed yet the scores changed from 69% to 76%. Each category varies from one evaluation to the next. The two evaluations even had different total scores possible. On top of all that, our second evaluation didn't even include descriptions of the deficiencies. Based on these inconsistencies, as a landlord I find it very difficult to respect the program and I'm sure it would not take long for renters to realize the same. My instincts tell me all buildings are seeing improved scores to falsely demonstrate the program is working.

I am not sure the municipality is aware of this, but cosmetic upgrades are not considered capital expenses in regards to the provincial rent increase above guideline application. This means there is a much greater incentive for landlords to fix elements of their building that pertain to its structural or mechanical properties. A great example of this are elevator retrofits. The capital expense is in range of \$100,000 to \$200,000 while the interior remodel of the cabin is an additional \$10,000 to \$20,000. Guess what? Most landlords opt not to refurbish the interior because it can be argued the upgrade was cosmetic in nature.

It's very clear the greater issue is that the lack of housing has created an environment where renters are forced to take whatever is available at ever increasing rates. The cost to buy a rental building is still generally cheaper than to build one. This means few new units are being built. Low interest rates have made construction of new rental units more viable but current rental rates still fall short of the levels needed to encourage development. Until rental rates move higher, we are not going to see new inventory especially at the rates we need to. I cannot help but feel this entire program is like a single bucket of water being thrown on a forest fire.

Warm regards,



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