



December 12, 2023

Toronto City Council
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Subject: **Urgent Reconsideration of Item PH8.16 - Amendments to Chapter 667: Rental Demolition and Conversion By-law**

Dear Toronto City Council Members,

The Federation of South Toronto Residents' Associations (FoSTRA) is a federation that currently represents 26 residents' associations (RAs) in the five downtown Toronto wards, Wards 4, 9, 10, 11 and 13, encompassing hundreds of thousands of Toronto's residents.

We are reaching out to voice our deep concerns over the proposed amendments to the Toronto Municipal Code Chapter 667 (Rental Demolition and Conversion By-law). Representing a collective of neighbourhood associations whose members are tenants directly affected by demoviction in purpose-built rental buildings, a primary focus is advocating for the preservation of affordable rental housing and sustainable development.

Key Concerns with the Proposed Amendments:

1. **Mischaracterization as "Housekeeping":** The proposed amendments, particularly the change in Code 667-14(B) that would eliminate the requirement for the City to consult with affected tenants and communities, have been inappropriately labelled as a "housekeeping exercise." This significant alteration in policy was neither recommended in the Auditor-General's report nor aligns with our understanding of 'housekeeping.' Removing this consultative requirement undermines the voices of those directly impacted by demoviction.
2. **Inadequate Tenant Consultation:** The process utilized for consulting tenants on these amendments was insufficient. Utilizing the Tenant Advisory Committee as the sole platform for tenant input on such critical issues is inadequate. Renters, constituting a significant portion of Toronto's population, deserve a more robust engagement process. The City's reliance on limited consultation platforms does not suffice to capture the diverse tenant experiences and challenges in Toronto.



Issues with Information and Compensation Regarding Demovictions:

Our member associations have encountered inconsistencies and a lack of transparency from City representatives regarding compensation and appeals related to demovictions. Each tenant and association has been provided with varying information, influencing their negotiation strategies and decision-making. Furthermore, there is confusion surrounding the role of the Ontario Land Tribunal (OLT) in relation to Section 111 agreements. The misinformation provided has significantly impacted tenants' rights and their ability to appeal.

Recommendations and Requests:

1. **Deferment of Vote on Amendments:** We urge the Council to defer the vote on these amendments until a comprehensive and meaningful consultation with No Demovictions and other tenant advocacy organizations is conducted.
2. **Withdrawal of Specific Amendment Proposal:** Specifically, we request the withdrawal of the amendment to Code 667-14(B). This change, which would remove the requirement for tenant and community consultation, is detrimental to those affected by demoviction.
3. **Enhanced Tenant Engagement and Transparency:** We recommend the City of Toronto commit to a more inclusive and transparent consultation process, ensuring a range of tenant voices are heard and considered in policy development.
4. **Independent Advocacy and Legal Support for Tenants:** The City should make it mandatory that tenants facing demoviction receive information from the City regarding independent nonprofit advocacy agencies and groups offering free legal advice to navigate the complexities of these processes.

In summary, FOSTRA emphasizes the importance of meaningful collaboration and dialogue between tenant organizations and the City to enhance affordable rental housing policies. We look forward to establishing a strong partnership with the City of Toronto for practical and progressive solutions in this regard.

Sincerely,

Rick Green
Chair