

June 25, 2024

To: Toronto City Council

From: Diane Chester, Niagara Neighbours for Community Safety

Re: EX15.3 Amendment – Advancing the Homelessness Services Capital Infrastructure Strategy (HSCIS) and the 2025 Shelter Infrastructure Plan – Supplementary Report

Thank you for taking the time to consider my letter. First, I will address my community's concerns regarding the amendment passed by the Executive Committee. Secondly, with only one half day to respond, I will provide detailed comments on the supplementary staff report published on the city's website at approximately noon on June 25, 2024.

A) EX15.3 Executive Committee Amendment

I am writing to express profound concern regarding the recent amendment made during the June 18, 2024 Executive Committee meeting to report EX15.3 on Advancing the Homelessness Services Capital Infrastructure Strategy (HSCIS) and the 2025 Shelter Infrastructure Plan. Specifically, the decision to direct the General Manager, Toronto Shelter and Support Services, to elaborate on the design and program model of new shelters directly to the June 26-28, 2024 City Council meeting raises significant transparency and public engagement issues.

Treating such a critical component of a multimillion-dollar program as an amendment rather than integrating it into the original EX15.3 report is extremely troubling. Bypassing the committee stage and presenting directly to Council deprives residents of the opportunity to voice their concerns or provide meaningful input. The design and program model should have been included in EX15.3 from the outset to ensure an opportunity for consideration and public participation. Additionally, the amendment lacks clarity on an implementation plan, which is crucial for understanding the practical implications of any new city program.

Moreover, as of Tuesday morning, this report was not even accessible on the City's website. This lack of timely access prevents Toronto residents from reviewing the information and offering essential feedback. These critical details necessitate thorough discussion at the committee level to enable residents to express their perspectives on the proposed plan.

The diminishing transparency of City of Toronto decisions is deeply concerning. Transparent and inclusive decision-making processes are fundamental to fostering trust and accountability within communities. It is imperative that the City reevaluates its approach to ensure that important decisions affecting residents are conducted openly and with ample opportunity for public engagement.

Our community has experienced a lack of transparency and accountability, particularly concerning the lack of design and program planning for the proposed shelter at 629 Adelaide Street West. Over the past 10 months, our neighbourhood has been mired in confusion and uncertainty regarding this new facility. Despite the signing of a multimillion-dollar lease in the fall of 2023, hundreds of emails obtained through a freedom of information request reveal ongoing discussions among senior city staff, third-party consultants, Councillor Malik's office, the service operator, and real estate agents. These discussions cover critical aspects such as the city's funding approval processes, the facility's intended purpose, target demographic, capacity considerations, high per diem costs, and the opening date originally slated for November 2023, yet the facility remains closed. No other neighbourhood in Toronto contends with the convergence of a 24-hour emergency shelter, a supervised-consumption site, and a multitude of other social services - surrounded by laneways, dead-ends, and large parking lots

- in such close proximity to two elementary schools and a residential area - the clustering, raises legitimate public safety concerns. The lack of outdoor space is also alarming and contradicts the city's own 300-page shelter design and technical guidelines, while the absence of funding for security and safety patrols, compounded by the service operator's lack of experience in managing shelters, exacerbates the situation.

B) Advancing the Homelessness Services Capital Infrastructure Strategy (HSCIS) and the 2025 Shelter Infrastructure Plan – Supplementary Report

I do not claim to have expertise in homelessness, the drug toxicity crisis, or the mental health crisis. However, I am acutely aware that in May 2023, Toronto City Council declared a "homeless emergency," which has received little mention of it since.

I am deeply concerned about the "homeless emergency" and the public safety implications related to these facilities. Our neighbourhood hosts several social service agencies near our homes, near two elementary schools, and a safe-consumption site just two blocks from the proposed location of a 24-hour emergency shelter at 629 Adelaide Street West. This clustering raises legitimate public safety concerns.

Recently, the City's Executive Committee requested the General Manager of Toronto Shelter and Support Services (TSSS) to "elaborate" on the design and program model of new shelters developed under the HSCIS. Unfortunately, today's report falls short of this request. Instead, it presents six broadly defined headings in no particular order, offering only general information that has already been covered in previous staff reports to City Council. This report does not effectively provide the any details on the design and program model for shelters under HSCIS as requested by the Executive Committee.

Instead, TSSS could have provided a more formal design and program model framework along with an implementation plan that would have demonstrated to Toronto City Council and Toronto residents that TSSS staff are, in fact, capable of delivering these programs safely and that they are well-planned, effective, and efficiently managed.

Here are several critical gaps in the report:

1. **Public Safety:** There is no mention of public safety measures or steps to mitigate incidents such as violence, criminal activity, public drug use, drug dealing, assaults, encampments, fires, property damage, and fatalities. These issues have been extensively documented at 25 Augusta Avenue and 169 Liberty Street, both operated by the same city-funded service provider slated to manage the proposed shelter at 629 Adelaide Street West.
2. **Auditor General (AG) 2022 Reports (Parts 1 & 2):** The report does not address any actions taken by TSSS in response to the Auditor General's report and its critical recommendations.
3. **Shelter Violence:** There is no mention of the alarming two-year shelter study conducted by TSSS and CAMH, which reported a 400% increase in violence at shelters — incidents that often spill over into surrounding neighbourhoods.
4. **New City Violence Reporting Tools:** There is no mention of BRASS, the new tool for reporting violence across city facilities, nor how this process is being implemented.
5. **Encampments:** The report does not discuss protocols for managing encampments or engaging the community should one appear near a shelter located in a residential neighbourhood.

6. **Impact on Neighbouring Residents:** There is no acknowledgment of the significant impact of shelters on surrounding neighbourhoods.
7. **Shelter Relocation Protocols:** There is no mention of protocols for shelter relocation in the event of serious incidents. Such relocations have occurred across Canada, including recently in Prince Edward Island.
8. **Shelter Standards:** The report fails to address the city's own shelter standards, notably Section 11.2.1 concerning weapons and prohibited items.
9. **Design and Program Model:** The report does not fulfill the specific request from the Executive Committee. It does not clarify what was requested of TSSS by the Executive Committee in its summary.
10. **Toronto Police Services (TPS):** There is no mention of the role of TPS in the program model, despite their involvement in the siting of all homeless facilities, including shelters. Furthermore, the report does not outline the role TPS is allowed to have once a shelter site is operational.

Below I have noted concerns with regards to the supplementary staff report:

Shelter System Pressures (page 2)

- The report specifically indicates an increase in mental health and substance use issues, yet fails to provide any supporting data. Proceeding with plans to open five shelters in 2024 without this critical data is concerning, especially given the complex needs of these populations. How will these needs be safely managed in dormitory-type settings at these sites? What is the design and program model for these individuals? Alarming, there is no mention of the critical skilled staff required to safely support individuals with such serious challenges.
- Furthermore, the report emphasizes the need for program adaptability, yet lacks details on the planning and implementation of the design and program model, as specifically requested by the Executive Committee. What does an adaptable program entail? What are its specific components? For instance, if a facility must adapt its programming due to a sudden change in demographics and the current service provider lacks experience in delivering those services, will a new operator be sought through a new procurement process? Clarity on what adaptability truly means in practice is essential.
- Decades of neglect in program planning for permanent, affordable, and supportive housing have led to the current multimillion-dollar shelter program. Had there been long-term capital planning even a decade ago, neighbourhoods would not now be compelled to accommodate respite sites and shelters.

Program Selection and System Gaps (page 3)

- The title of this section includes "program selection" yet it fails to mention any program selection details and how TSSS intends to address them.
- The title of this section also mentions "system gaps," yet it fails to explain what these gaps are and how TSSS intends to address them.
- The next City Street Needs Assessment (SNA) is scheduled for October 2024, with the last assessment conducted in 2021. Despite this, the city plans to proceed with siting five shelters in neighbourhoods without current data to understand the client population and their specific needs and therefore, program selection. The original staff report also outlines a budget of \$89 million for these five shelters, but does not include operating costs for service providers, nor does it disclose the locations to Toronto residents. The lack of transparency and accountability is very concerning.
- This section briefly mentions "case management" without providing details on what this entails. Following this, various assessment needs are discussed without definitions, stating

that nearly 63% of individuals require moderate to high support. However, there are no program specifics explaining what this entails, skilled staff required, shelter design to accommodate individuals requiring higher support.

- Subsequently, "case management" is mentioned again with vague information on housing transition, with the last sentence briefly noting the need for "higher intensity health and mental health specific supports" and no further explanation.

Shelter Service Model (page 4)

- This section raises significant concerns, particularly regarding the siting of a shelter at 629 Adelaide Street West. It notes that in 2017, City Council approved a New Shelter Service Model (now the Shelter Service Model). However, in 2023, TSSS approved a multimillion-dollar 10-year lease for this location, significantly benefiting the building owner, despite its shabby and poorly maintained condition. The site is mere meters from an elementary school and two blocks from a safe-consumption site, yet lacks critical outdoor space in contradiction to the city's own 300-page Shelter Design & Technical Guidelines.
- It is very concerning that the planned shelter at 629 Adelaide Street West does not align with the Shelter Service Model, despite being categorized as a 24-hour emergency shelter.
- It has been revealed through freedom of information requests that this site was not chosen based on evidence-based best practices as outlined in the Shelter Service Model. The decision to lease 629 Adelaide Street West was a hasty response to a failed lease negotiation at 65 Bellwoods Avenue, which was half the size and faced neighbourhood public safety concerns. This highlights a lack of proper project management planning and financial oversight in siting such a costly facility, especially without addressing critical infrastructure issues such as public safety.
- Originally planned to open in November 2023, this 50-bed facility, fully funded by the City of Toronto, remains closed, underscoring the challenges and missteps in its implementation, design, and program model.
- This section also mentions participation in the "City's Coordinated Access" housing system, but provides vague program details and lacks data on the process duration, success metrics, and problem-solving strategies.
- Similarly, connections to health services are mentioned without accompanying data or metrics regarding success rates and problem-solving outcomes.

Community Engagement to Support New Shelters (page 7)

- Our community first learned about plans to lease and site a facility at 629 Adelaide Street West through rumours, and despite requests, we received form letter responses from city staff and Councillor Malik's office. Our attempts to arrange face-to-face meetings with the service operator, Councillor Malik, and TSSS General Manager Gord Tanner went unanswered.
- While the report describes fostering solution-based engagement with the community, over the past 10 months, our neighbourhood has been in turmoil with confusion and uncertainty regarding this new facility and a lack of genuine engagement with no solutions.
- Due to the lack of engagement, we undertook a freedom of information request that revealed hundreds of emails between senior city staff, third-party consultants, the service operator, Councillor Malik, and real estate agents discussing various aspects including funding approval, the facility purpose, the target demographic, capacity, high per diem costs, and the delayed opening date after the lease was signed (originally planned to open in November 2023, yet the facility remains closed).
- A lack of funding for security and safety patrols was also noted, combined with the service operator's lack of shelter experience, further exacerbates the situation, highlighting systemic flaws within the city's homeless program.
- Regarding the city-funded private third-party engagement firm, our experience has been characterized by a lack of communication and an inability to thoughtfully and efficiently

respond to our community concerns. On Sunday, May 5, and Monday, May 6, 2024, prior to and during a "community walk," residents were discouraged and threatened from participating by the city-funded third-party engagement firm, Barnes Management, and senior city staff.

- The term "stakeholder" is mentioned in this section, but is inconsistently applied. Our experience shows that neighbourhoods without an association are disregarded in engagement processes, despite residents knowing their area best. Proximity to the shelter does not guarantee inclusion or consideration in the community engagement process.
- The transfer of community engagement to the site operators, in our case if the shelter opens, will be to a site operator with no experience managing a shelter. Particularly troubling is the extensive documentation of these issues at two other respite sites—25 Augusta Avenue and 169 Liberty Street—both operated by the same city-funded site operator set to manage the proposed shelter at 629 Adelaide Street West. These incidents raise serious doubts about the provider's ability to safely oversee such a critical facility in the heart of a residential neighbourhood.
- Finally, what is the process when a Councillor does not support the siting of a shelter in their Ward? Is there a process and can a Councillor turn down a shelter in their Ward?

Shelter Design and Technical Guidelines (page 8)

- These guidelines, as noted earlier, starkly contrast with the decision to site the shelter at 629 Adelaide Street West. While the report mentions "responding to the needs of the surrounding community" and includes principles emphasizing safety and security, the location of this shelter fails to adhere to these guidelines.
- This section lacks detailed information on successful facility designs and examples thereof. It lists five addresses without providing specifics on location, duration of operation, demographics served, shelter design, community integration, or positive impacts achieved.
- Of particular concern is the mention of "appropriate outdoor areas," which sharply contrasts with the lack of outdoor space at 629 Adelaide Street West.
- TSSS documents we have found make no mention of "fostering honest and transparent collaboration with neighbourhoods"; residents are often disregarded and viewed as obstacles to shelter siting. In one instance, during an initial Zoom meeting with local residents, the Executive Director of the planned facility abruptly left the meeting without notice upon encountering a difficult question.

Operator Selection Process (page 9)

- While this section outlines the "carefully crafted" selection process for service operators, a process that has not been evident in our neighbourhood, our community remains deeply concerned about the lack of experience of the planned operator for 629 Adelaide Street West.
- A freedom of information request revealed that the city-funded service operator, initially claiming to relocate an existing 24-hour respite site, was suddenly granted approval for a self-described "new program" — a 24-hour emergency shelter with significantly different program standards. This includes critical components such as case management, which had already been scrutinized by Toronto's Auditor General in 2022. Importantly, this "new program" did not involve a city-led procurement process to consider other experienced service operators. Most concerning is that this operator has no prior experience managing an emergency shelter.
- When our community sought a copy of the operating agreement between the city and the city-funded service operator from the city's privacy office, we were informed that such an agreement did not exist. Nevertheless, the lease had already been approved by the city, raising further questions about transparency and accountability.

Long-Term Use (page 8)

- There are no details in this section of the report regarding site selection and, as mentioned, with the five future sites remaining confidential Toronto residents having no idea on future of their neighbourhoods. A visit to area around Queen and Bathurst Streets will help Councillors understand the challenges in effectively and safely managing these types of facilities.

Next Steps (page 9)

- Our community strongly recommends that TSSS city staff undergo community engagement training and prioritize building collaborative relationships with neighbourhoods, rather than continuing to divide communities as we have experienced.

Unfortunately, this report simply rehashes information already presented in previous staff reports. It fails to offer new or compelling insights and notably excludes essential data and specifics concerning the design and program model for shelters. The tone of this report starkly contrasts with the realities and concerns faced by our neighbourhood and other neighbourhoods we have visited including 25 Augusta Street, 169 Liberty Street, 21 Park Road, 129 Peter Street, 75 Elizabeth Street, 545 Lake Shore Blvd. West, and so on.

We urge Toronto City Council to:

- Demand more detailed data and information from TSSS regarding shelter design and program planning, particularly for the five shelters planned to open in various Toronto locations.
- Send this report back to committee and provide residents an opportunity to respond to the supplementary report, especially in light of our concerning neighbourhood experience. It is crucial to prioritize transparency and public involvement at every stage of decision-making concerning significant community initiatives, particularly those impacting critical community public safety and the establishment of 24-hour emergency shelters.
- Demand answers regarding our neighbourhood's experience with the siting of a shelter at 629 Adelaide Street, as this troubling and confusing situation could arise in your own Ward.
- Ask TSSS General Manager what his design and program model is to ensure public safety in the siting of 24-hour emergency shelter in your Ward.

With city plans in progress to open 20 shelters, including five in 2024, our community's experience serves as a cautionary tale for all Toronto neighbourhoods.

Thank you,

Diane Chester
Niagara Neighbours for Community Safety