

From: Housing Rights Advisory Committee, City of Toronto

Dear Mayor Chow and City Council:

We are the City of Toronto's Housing Rights Advisory Committee (HRAC). Our mandate is to provide advice to City Council on strategies and actions required to achieve the City's commitment to the progressive realization of the right to adequate housing. The HRAC is made up of residents who experience housing precarity and homelessness, housing advocates, academics, service providers and community organizations.

As you prepare to vote on the City Budget, we hope to see your support for programs and policies that prioritize the needs of those with lived and living experience of housing precarity, housing discrimination and homelessness. The budget process is one of the most important steps in meeting the City's HousingTO 2020-2030 Action Plan targets. The City Budget also serves as a reflection of its commitment, as outlined in the Toronto Housing Charter, to allocate the maximum available resources, within the City's means and jurisdiction, towards the progressive realization of the right to adequate housing and prioritize those in greatest housing need.

We are pleased to see some new and enhanced funding for programs that support maintaining our deeply affordable and affordable rental stock and protections for renters: operating subsidies for Toronto Community Housing Corporation (TCHC) and Toronto Seniors Housing Corporation (TSHC), the Toronto Tenant Support Program (TTSP), the Multi-Unit Residential Acquisition Program (MURA), Rent Bank, Eviction Prevention in the Community (EPIC), the Rental Renovation License Program, and RentSafeTO.

Promising progress has also been made to address Toronto's homeless crisis, such as increased funding for expanding the encampment office, mental health and wellness support for shelter staff, increased drop-in hours during the winter, outreach on the TTC for people experiencing homelessness, and building new shelter sites from the Capital Program.

Nevertheless, we believe the following could be better supported by the 2025 City Budget:

### **Multi-Tenant Homes**

Multi-Tenant Homes (MTHs) are one of the most affordable options for single low-income people in the private rental market. The challenge is to keep these homes affordable when it can cost tens (sometimes hundreds) of thousands of dollars to bring these MTHs into compliance with Ontario Building and Fire Codes.

As of now, the City's Multi-Tenant Renovation Program will receive \$3 million in 2025, then \$2 million per year until 2029, rather than receive a yearly increase. Though this renovation program is a positive step in ensuring these homes are safe to live in, we are concerned that landlords who will not be able to cover the full costs of renovations will choose to sell their

homes or stop renting them out. We would like to see the yearly amounts for 2026-2029 be raised to \$3 million per year or more, which could mean we could see many more units renovated per year.

The result of MTHs being taken off the market is that vulnerable MTH tenants will be faced with further housing precarity or enter homelessness. Some tenants will be able to find alternate housing on their own, but many will need additional assistance in their search as well as ongoing support to bridge the gap between their current rent and the rents for available homes.

We commend the City for offering existing services such as the Toronto Rent Bank, EPIC and Toronto Tenant Support Program to MTH tenants. However, we would like to see an increase in funding to support specialized programs and plans to support displaced MTH tenants specifically, whether they are displaced due to fire safety issues or other reasons.

As part of the MTH bylaw landlords who are closing their units must submit an *End Operations Transition Plan*, which includes providing a list of alternate accommodations to their tenants. This is simply not adequate support for displaced tenants. We suggest there be a requirement for landlords to proactively support displaced tenants in securing new rental housing (providing good references, getting in touch with other landlords, etc.), to cover moving costs, and provide the equivalent of three months of rent gap compensation between their old and new rates - regardless of whether they are already meeting compensation requirements for evictions under the Residential Tenancies Act. An increase in funding for the MTH framework could help hire additional staff to ensure these requirements are met by landlords.

Finally, we hope the City puts resources into developing a robust monitoring and evaluation plan that will allow for continuous learning and improvement of MTH programs, as well as data collection efforts to track the displacement of MTH tenants, so improvements can be made on an annual basis.

### **Eviction Prevention and Support**

In 2023, 35 percent of households eligible for Eviction Prevention in the Community (EPIC) services identified as Black; 4 percent identified as Indigenous. For a city that is seeing evictions and renovictions occur at a rapid pace, we need to continue supporting communities that are disproportionately facing precarity in Toronto's rental housing market, such as Black and Indigenous households, as well as individuals receiving social assistance.

The Mayor's Budget reflects new funding for an EPIC Interim Rent Relief Pilot (IRRP) to support lower income households facing eviction who require temporary rental assistance to sustain their existing housing for the long-term, targeting households transitioning from a lower to higher income (such as individuals transitioning to Old Age Security, Canada Pension Plan income, Ontario Disability Support Program). This investment would support between 130 and 170 households with an interim rent relief benefit for an average of 6 months. We would like to see

this funding increased beyond the proposed amount so that the pilot could support double the amount of households in 2025.

Equally, we recommend an increase to Rent Bank funding. The Mayor's Budget has confirmed \$1 million in additional funding for Rent Bank to expand to 300 additional households to avoid eviction. This additional funding has increased the 2025 target to 2,700 households per year. We welcome this increase, however, we hope to see enhanced funds so that at least 3,000 households per year (starting in 2025) can avoid eviction. Rent Bank funding is a crucial service that ensures equity-deserving groups, including Black and Indigenous individuals disproportionately impacted by evictions, can stay in their housing in Toronto.

### **Supports for Those Who Are Unhoused**

More people with diverse needs are seeking shelter in a system that is already at capacity. The City needs to continue efforts to engage with people with lived experience of homelessness and service providers to ensure that homelessness supports and services meet this growing need.

During the winter months, we would like to see extra funding to support the Winter Services Plan. New warming centres should be included in this plan, especially ones outside of the downtown core (e.g., Scarborough and Etobicoke) that are located near services and public transit.

Those displaced from temporary respite sites should also receive additional supports to relocate to nearby shelters and housing units as quickly as possible.

Moreover, we would like to see more funding to support specialized services for equity-deserving individuals and communities experiencing homelessness. For example:

- Survivors facing gender-based violence require more dedicated shelters with trauma-informed care.
- Indigenous people make up 15 percent of people experiencing homelessness, and 23 percent of people sleeping outdoors identify as Indigenous. Moreover, 2SLGBTQIA+ individuals face significant challenges in the shelter system that put their safety and privacy at risk. As such, and in line with the City's commitments to advance Truth, Reconciliation and Justice for 2SLGBTQIA+ individuals, we would like to see additional funding for 2SLGBTQIA+ shelter spaces and transitional housing.

In addition, as we face the closure of many safe consumption sites across the province, the need for adequate funding for the City's drop-in services will only grow. The City should consider additional funding to expand drop-in programs and hire more staff, as well as provide mental health supports for staff at these sites.

And while support for the emergency shelter system is critical, we also know that supporting people who are unhoused will also mean increasing the supply of long-term, deeply affordable housing. To this end, the City should continue to work across its divisions and with other levels

of government to maintain and expand social housing, especially housing that offers other services, such as health and income support.

### **Revenue Tools**

We encourage the City of Toronto to continue using and introduce new revenue tools, and progressive taxes (that do not harm low-income residents) to enhance funding for programs that preserve and increase the supply of affordable and deeply affordable housing in Toronto, including non-market housing.

The Housing Rights Advisory Committee hopes to continue working in collaboration with City staff and Councillors to support greater accountability, transparency, increased funding and creative solutions to advance the City's commitment to the progressive realization of the right to adequate housing. We look forward to the results of the final vote on February 11th as they are a huge step into achieving safer, more affordable and adequate housing for those most in need.

Sincerely,

Housing Rights Advisory Committee (HRAC), City of Toronto

Contact:

Elizabeth McIsaac  
Chair, Housing Rights Advisory Committee (HRAC)  
[emcisaac@maytree.com](mailto:emcisaac@maytree.com)