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April 10, 2025

Toronto Planning & Housing Committee
Toronto City Hall
100 Queen Street West
Toronto, ON, M5H 2N2

Attention: Planning & Housing Committee Members

Re: PH 20.2 - Implementation Guidelines for Rental Replacement

Dear Planning & Housing Committee Members,

I am writing on behalf of the Moss Park Coalition to support the recommendations put forward by *No Demovictions* (the full list of recommendations can be found [here](#)), which calls on the City to implement the following:

1. Strengthening Enforcement, Monitoring & Transparency:

- ☐ **Data collection:** City of Toronto must collect and publish data on the outcomes of demovicted tenants, development milestones, and replacement unit affordability periods. This will help the City better understand the impact of demovictions on Toronto's housing supply.
- ☐ **Increased staff capacity:** City of Toronto must increase staff levels (funded by developer fees) to enable sufficient monitoring, enforcement, and ensure that the developer is compliant.
- ☐ **Section 111 (S.111) agreement transparency:** Every tenant should have easy access to a free copy of the Section 111 agreement for their building to better understand their rights. There is currently a fee and a lengthy application process to access this information.

2. Meaningful Tenant Support and Consultation:

- ☐ **Tenant support:** Create a developer-fee-funded program to hire a third-party non-profit organization to provide integrated housing, legal (referrals), and social/mental health supports for all tenants facing demoviction. Includes door-to-door outreach and assessment to ensure that accessibility and requirements are considered and that *no tenant is left behind*.

- ☐. **Working groups:** Require at least 3 working group meetings, to ensure that tenants have meaningful input into the proposal, the process, and have any concerns addressed.

3. **Ensure equity and fairness in compensation and replacement units:**

- ☐. **Post-application tenants:** Advocate for reducing the period of ineligibility for post-application tenants, so that they have the right to return, receive rent gap payments, and the supports suggested in 2a.
- ☐. **RentSafeTO for all replacement units:** RentSafeTO provides essential maintenance enforcement for tenants and should apply to rental replacement units.
- ☐. **Loss of amenities:** Ensure that any loss of amenities and unit square footage are provided a commensurate rent reduction for tenants.
- ☐. **Annual guideline rent increases:** The City of Toronto should introduce a formula to ensure that rent gap payments cover the entire difference of the unit during the displacement period, including the Provincial annual guideline rent increases.

I strongly urge Councillors to vote in favour of any motions and/or amendments that would support the recommendations outlined above, and continue to work with and consult *No Demovictions* in the further development of practices and policies. These would help significantly improve outcomes for tenants facing demoviction across Toronto.

Many thanks,

David Anderson