

Dear Toronto City Council Members!

Comments below are related to Item 2026.PH29.5 [Advancing the City's Affordable Housing Access System](#) of the City Council [meeting 41](#).

The Housing Secretariat Executive Director's Report highlights progress in adding Affordable Rental homes to the existing city Centralized Housing Access System. It states that most applicants would be subject to Random Draw, with some Targeted Allocation categories subject to Direct Placement of eligible households, while RGI units in Affordable Rental Communities will be filled from the RGI waitlist in compliance with Housing Services Act and the city Local Priorities.

The above Report also presumes Stakeholder Engagement including RGI applicants, seniors groups and existing TCHC and TSHC Tenant Advisory Committees, among others. Since I belong to all of the above (RGI applicant, a senior, and TSHC STAC member), I wanted to provide the feedback sought for by the Executive Director.

I. ENABLING INTER-PROVIDER LOW INCOME TENANT TRANSFERS

1. The city owned housing providers like TCHC and TSHC house primarily RGI supported tenants and have published Tenant Transfer Policies on their websites. There may be situations when Transfer Applicants would not be willing to seek an alternative transfer unit within the same provider's buildings portfolio. It may happen for example in case of alleged persecution of a tenant by the provider for bringing reports about law violations against targeted tenants committed by staff at building properties, or reported theft of public funds, or similar matters exposing improper corporate leadership engagement or lack of thereof.
2. In such scenarios, the Transfer Applicants should be able to request transfer into a different housing system, for example from TSHC RGI unit into an RGI supported or affordable unit in a chosen Affordable Rental Community. I'm aware of such offers extended to some tenants, for example by their ward City Councilors engaged in such complaints investigation and attempted resolution.
3. Eligibility Criteria for such inter-system Transfer candidates and a method to register them in the Centralized Housing Access system should be also developed and likely eligibility assessed for each such applicant by the proper departments of the Housing Secretariat. Approved Transfer applicants should be able to View available units for their category, Register to attend the unit for viewing, and Accept an Offer of such alternative accommodation in a unified way like other RGI candidates. The Random Draw is hardly acceptable for such Transfer Applicants, especially emergency based.
4. Housing Secretariat should provide more information about integration passways of current RGI supported Tenant Transfer Requests in case of such "inter-system" transfer applications. The City Council and its PHC Committee are suggested to request the subsidized Housing Providers to update their Tenant Transfer Policies with the "inter-system" transfer option and application passways.

II. OTHER RELEVANT POLICY AND BY-LAW IMPROVEMENT SUGGESTIONS

To illustrate when tenant transfers to a different provider may be necessary, I describe my own story below and provide relevant policy and by-law improvement suggestions.

The City Council successfully addressed in 2025-26 the negative *Renoviction* trend among Toronto Landlords aimed at rising tenancy rent. However, some landlords keep looking for new way to speedup tenants turnaround allowing rent hike or renovation funds increase at Toronto owned properties. As an active ACORN Tenants Union member, I witnessed growing tenant complaints about the landlords intentionally contaminating indoor air in some buildings or targeted units to speedup tenants turn around aiming rent increase or suppression of tenants maintenance complaints. Some landlords also altered drinking water pipes layout allowing to add chemical contaminants to water supplied to targeted tenant units and downstream the building section. This also happened to me while being a tenant of Toronto Seniors Housing Corporation (TSHC).

After I reported the above atrocities to TSHC and TCHC Board of Directors, TSHC leadership failed to perform independent investigation and reverse the illegal unit alterations allowing air and water contamination in my unit and common building areas, but instead prohibited the building staff from addressing and documenting my complaints or entering my unit. In sharp contrast, the landlord pedaled endless investigations of my alleged "misconduct", openly solicited and accumulated false reports about it without any investigation, and then filed a frivolous LTB Eviction Application trying to make me homeless. My attempts to engage Toronto MLS and Public Health in enforcing relevant laws and by-laws revealed major gaps in current Toronto Property Standards by-law (Chapter 629) and MLS & RentSafeTO & Public Health and other agencies enforcement practices.

Therefore, I suggest the following improvements to the relevant City By-laws and Enforcement Practices:

A. Toronto Property Standards & MLS inspection practices

The amended [Toronto Property Standards](#) (Item - 2025.PH25.8 approved by City Council on Nov 12, 2025) coming into effect May 01, 2027 can be effectively improved:

1. § 629- 4.13. Interior walls and ceilings

In addition to outlining required "wall" conditions, add:

Sec A: add definition of interior decorative drywall, and Pipe and Electrical Conduit Compartment covered by unit and/or hallway drywalls;

Sec D (new): mandate MLS to inspect Pipe Compartments in case of resident fumes & odor complaints, looking behind the covering drywalls to examine and seal gaps and cracks around pipes penetrating unit walls, ceiling and floor to ensure proper units safety separation in residential rental building, and not only in combined residential & industrial properties. Joint inspections are encouraged by the Toronto Building and /or Fire Prevention inspectors.

2. § 629-4.24. Plumbing; water and sanitary facilities

Sec. A(2) and B(1): in case of resident complaints of degraded unit supplied drinking water quality compare to building common areas and neighboring units, ensure joint inspection of the unit water pipes layout by MLS and Toronto Water inspectors, taking when required drinking water samples by Toronto Water Lab Technicians to analyze water quality, gaining access to Pipe Compartments behind unit drywalls that may conceal unauthorized pipes alterations and purposeful contamination access points and attachments in the unit kitchen and/or bathroom.

3. § 629-4.26. Ventilation

Sec D and D(2): amend the section and subsection, including not only "mixed use property", but also enforcement in solely residential buildings in case of tenant fumes complaints. Residential properties may also have noxious fumes or gases present in units or common areas due to purposeful or unintentional indoor air contamination through gaps around pipe and electrical conduit wall and ceiling penetrations, including carbon monoxide proliferation in case of fire. The section must stipulate gas-tight construction and unit separation if such conditions are present by means of sealing the gaps, and if required sealing wall electrical outlets and switches, wall lamp mounts and floor baseboards. Joint inspections may be conducted by MLS and Toronto Fire Prevention or Building inspectors.

4. Entry to residential premises with and without 24H Notice

Suggested improvements were posted by me in the Communications section of today's City Council Session Item - [2026.MM41.5](#) *Improving Training of City Enforcement Staff*

B. Toronto Public Health - Healthy Environment Unit Improved Inspection Practices

Suggested improvements were posted by me in the Communications section of today's City Council Session Item - [2026.HL32.2](#) *Service Agreements Awarded and Executed by the Medical Officer of Health for 2026*

C. Toronto City Manager

1. Create and oversee *Joint Inspection Guidelines* aiming to ensure joint work and cooperation framework of various City By-law and law Enforcement Units in enforcing mentioned above Healthy Environment provisions of Toronto Property Standards, other relevant laws, by-laws, practices, manuals and regulations. That includes joint work of *TPH, MLS & RentSafeTO, Toronto Water, Toronto Building, Toronto Police, Toronto Fire Services, Ambulance* and other relevant city departments.

2. Ensure independent inspections of alleged purposeful water and indoor air contamination by the city inspectors and specialized contractors reporting to the City Manager or its designee instead of landlords themselves that often results in violations cover-up and retaliation & reprisal to complaining tenants.

D. Toronto Housing Secretariat

1. Request TSHC Leadership to provide report on failure to professionally investigate ongoing tenants' complaints of purposeful indoor air and drinking water contamination in targeted units and common areas of our seniors building at 4455 Bathurst St, North York with near 400 elderly residents.
2. Request TSHC Board of Directors to temporarily remove my Tenancy File from Operations branch supervision and conduct prompt **independent investigation** in full bypass of TSHC management of the above tenant Reports and full reversal of found illegal unit alterations enabling air and water contamination in targeted by staff residential units and building common areas. The company staff organizing these atrocities must be promptly removed from the building.
3. Request TSHC Board of Directors to investigate why TSHC leadership filed an LTB Eviction case against the tenant in acute violation of several Corporate Tenant and Whistleblower Reprisal and Eviction Prevention Policies mandated by the Shareholder Directions and therefore revoke the LTB Application.

Thank you,
Arnold Margulis, senior - tenant
4455 Bathurst St, North York ON M3H 5X7