Preferred Options – Working Paper

Solutions Lab on Healthy Housing Quality

Wellesley Institute

March 2020

This is the fourth report from the Solutions Lab on Healthy Housing Quality, funded by Canada Mortgage and Housing Corporation and carried out by Wellesley Institute in collaboration with SHS Consulting.

Following Phase I start-up work, the reports from Phases 2 and 3 of the Lab (September 2019 to March 2020) are:

Framing Report (December 2019)

Jurisdictional Scan (December 2019)

Report on Phase II (December 2019)

Preferred Options – Working Paper (March 2020)

1. Introduction

Wellesley Institute has been funded by Canada Mortgage and Housing Corporation (CMHC) to carry out a collaborative Solutions Lab, 'Best Practices for Healthy Housing Quality in Toronto'. Wellesley is working with SHS Consulting which has related expertise in housing policy research and solutions labs.

The project's focus is to identify the problems of poor housing quality in parts of the private-rental apartment building sector and to find better responses to address these. The Lab is a collaborative process lasting from mid-2019 to mid-2020. Understanding that the issue of healthy housing quality is multi-faceted, the Lab aims to work with a wide range of stakeholders to frame the problem, understand the current state, and co-design a set of solutions to address the issues. Stakeholders include tenants, property owners/managers, City of Toronto staff, and housing and health experts.

This options paper provides the results of **Phase III**, the **Development** phase. It describes the leading preferred solutions emerging from both Phase III workshops held in February 2020. It   Each preferred solution as identified by the lab participants is followed by additional analysis by Wellesley Institute to provide context and information that may help them refine the solutions as they move on to Phase IV, - the prototyping phase.

The solutions lab builds on the knowledge and experiences of other recent work relevant to health and housing in Toronto, including the Tower Renewal Partnership, the City of Toronto's RentSafeTO standards and enforcement program, the City's Resilience Strategy, the experience of its Tower and Neighbourhood Renewal initiative.

The project does not deal with public and non-profit housing, nor with the 'secondary' rental housing market which ranges from basement apartments to rented condominiums.

2. The Solutions Lab Process Leading to these Options

Discovery

The Solutions Lab process begins with a problem definition and 'discovery' phase, then moves through solution-finding and framing options, and then to a final roadmap for action (Figure 1).

Figure 1
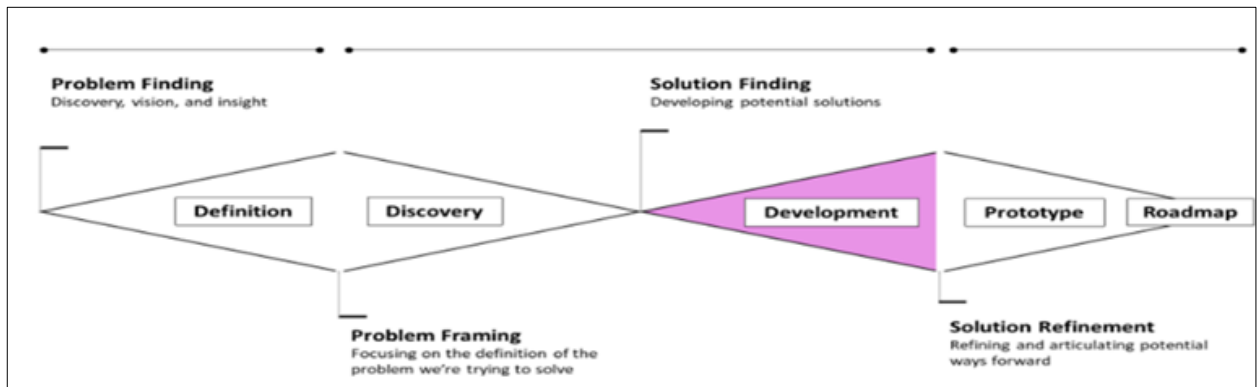
Research conducted in the fall of 2019 supports this lab process i.e., a framing paper of the issues and existing responses, an international jurisdictional review, interviews with experts in the field of housing or the determinants of health as well as small group consultations. It is this information that connects the solutions lab process over each phase of the project.

Bringing together persons with long-standing interests in this work during Phases I and I, resulted in a shared understanding of the current systems. Representation from building owners, tenants, city staff and other health and housing stakeholders considered emerging trends affecting the system, barriers to more effective action, and an identification of possible successful interventions. Power dynamics between landlord and tenant and relationships between stakeholders and systems-level interventions were discussed. All participants in the Lab agreed that this process represented a significant first collaborative step in Toronto with these sectors participating in a joint process, sharing information and perspectives and working to find ways forward.

Identifying Solutions

Phase III builds on the initial problem framing in Phase II and lays a foundation for solution refinement in Phase IV. All those who participated in the Phase III workshops, held on February 4th and February 21, 2020, were involved in Phase II in some capacity; they had demonstrated an awareness of the issues and offered their perspectives on how to deal with those issues. The purpose of the first workshop in early February was to develop preliminary options for solutions. The second workshop, later in the month, focused on narrowing and prioritizing those options.

In the first meeting, Lab participants validated the issues and problems identified in Phase II and considered the possible solutions. Issues and problems as outlined in the Summary Document of December 2019, included building age and deterioration, lack of investment and accountability for ongoing maintenance, affordability, quality of life for tenants, burden on tenants to solve problems, and the high cost of repair and retrofit.

Initial thoughts about how to address these issues considered solutions such as changing regulations, providing incentives, building capacity, improving relationships or developing new services or business models. Also considered was how data or knowledge of other promising practices could be used to help resolve issues.

Participants broke into three groups, with varied sector representation in each, and attempted to answer more completely two framing questions that had been asked initially in Phase II:

1. How might a healthy housing initiative for older private rental apartment buildings ensure good repair and quality of housing in Toronto?
2. How might we identify best practices and initiate new regulatory or program interventions to address this challenge?

Participants of each group wrote down their ideas and then clustered their ideas into broader themes.

Following the February 4th workshop, SHS Consulting and Wellesley staff categorized these ideas into nine solution ideas for presentation back to the February 21st workshop.

Results of Workshop #1 Initial Solution Ideas

1.	Acquisition of buildings	Is it possible to create a new vehicle or a means to acquire unsafe and aging stock to improve healthy quality of housing?
2.	Property taxes	Property tax changes are required to achieve equitable taxation of homeowners and owners of multi-family residences.
3.	Investment and funding	A new method of investment is needed that provides alternate financing sources for repairs, renovations, or retrofits to improve the health of buildings
4.	Operating Cost Savings	What initiatives could be put in place to promote operational cost savings, initiated by and beneficial to both landlords and tenants?
5.	Industry Capacity	There is a need to foster a sustainable and thriving building and manufacturing industry around retrofits and repairs for healthy buildings
6.	Tenant Capacity	More can be done to empower tenants through education and resources and networking to achieve healthy housing.
7.	Evidence and data	A commitment to support, strengthen and share data to create evidence-based policies and programs for healthy housing
8.	Ongoing stakeholder shared 'platform'	A continued collaborative process for problem-solving is required. Stakeholders need to come together to identify root problems, build trust and co-develop solution.
9.	Standards and Enforcement	What is required to move forward new or improved standards, and ensure adequate enforcement to improve healthy housing quality?

Results of Workshop #2 Prioritizing Themes

At the second workshop in Phase III, participants were presented the solution categories above. All had an opportunity to comment on what they felt was missing or incorrect. Some participants were interested in the overall policy framework for rental housing and believed that standards and enforcement should be included within this framework. The development of an ongoing stakeholder 'platform' or shared process was a matter of strong interest to many participants. Although these two types of solutions were judged to have overarching importance, there was consensus that the other categories were a better fit for a focused solution development.

Participants were asked to consider the following criteria before choosing their most preferred solutions.

Fit and impact	Does it fit the nature of the problem? Would implementation help us reach our objectives? Does it address more than one problem?
Doable	Is it practical? Have others done it? Can it be implemented?
Innovative and Distinct	Does it fill a gap? Is it different from other approaches?
Experience	Does it build on local experience or what is already being done?
Supported	Would it be supported by others, such as government, stakeholders, public?
Synergy	Can it create other opportunities that lead to more options?
Scalable	Can it be replicated elsewhere?
Clarity	Is it clear enough? Does everyone know what it means?

After consideration of all nine categories for solutions, participants preferred the following categories:

1. **Acquisition of Buildings**

2. **Investment and Funding**

3. **Enhanced Tenant Capacity**

4. **Standards and Enforcement**

3. The Four 'Solutions'

This section discusses each of the four solutions in turn. For each one, a text box appears first and summarizes the discussion at the Lab workshop in the form it was recorded at the time. The information that follows on the next page provides context and a broader explanation and rationale for the option, drawing on information from the framing paper, expert consultation interviews, and the jurisdictional review completed in Phase II. Also included are additional perspectives or information for consideration that may be of benefit for participants as they work towards drilling down and refining these four solutions in Phase IV.

Solution 1: Acquisition of Buildings

Acquisition of buildings – As identified by participants in the Lab:

Objective

The City of Toronto to acquire buildings from building owners that are either unable or unwilling to provide quality housing to low-moderate tenants.

Concept

Allow the City to have the first right of refusal for all buildings built before 1985 that come up for sale.

Actions required

1. Determine which buildings are in the worst condition and should be considered for purchase

2. Establish the legal right for a 'pre-emptive purchase' and a legal City mechanism to do so

3. Acquire substantial funding to purchase and renovate the building. Funding methods could include:
    a. Federal or provincial grants
    b. Revenues from city taxes explicitly allocated for this purpose, for example, a vacancy tax
    c. Loans which can be paid back when the building is repaired and sold
    d. Bonds from the federal government
    e. Portfolio approach with funding from CMHC.

Acquisition of Buildings: Context, Explanation and Rationale

The focus of discussion at the February 21st Solutions Lab was buildings in severe disrepair, specifically where the enforcement of standards has failed to ensure decent repair. A public or non-profit entity that takes ownership can directly carry out the needed repairs in these buildings.

Precedents and examples of this approach

The group that worked on this solution identified it as a 'big project', something very new and transformative for the City of Toronto and one that could have a significant impact on the state of building safety.   Chicago and Montreal, in different ways, have implemented policy and funding mechanisms to achieve this on a significant scale.[1]

Chicago, through its *Troubled Building Initiative*, works first with community groups, elected officials, and city enforcement officers and then with the courts to attempt to bring buildings to a decent state of repair.[2] As a last resort, if the building owner is unwilling or unable to make appropriate repairs, the courts may assume the building, make repairs and then turn the building over to an owner who will maintain the affordability of the building.

Montreal, by provincial legislation, has substantially more control than Toronto over its economic and social development and urban planning. Montreal now has a pre-emptive right of first refusal to buy private buildings (residential and non-residential) that are offered for sale in designated areas. The city can purchase the building for a fair value and has six months to determine if it wishes to buy the building to use for any public purpose, including non-profit housing. [3] As of February 2020, Montreal has identified 300 properties that it would attempt to buy using this process for the purpose of creating more social housing.[4]

What this approach would involve

Precedents in Toronto and other cities point to four key ingredients for the acquisition solution.
1. There must be an organization with relevant expertise and financial capacity. This could be a City division, a City housing corporation, or a City agency that does affordable housing development. It could be a relatively large non-profit working with the City and with tenant groups.
2. Access to financing and funding (mortgages and equity) are essential. These will cover the purchase (typically over $200,000 to buy an average Toronto rental unit today) and the repair and retrofit. Financing enables costs to be paid over a length of time – limiting the current budget impacts – while direct funding keeps the mortgage moderate and rents affordable. Discussion at the Lab touched on various funding options, ranging from federal or provincial grants to dedicated City revenue sources, or federal financing through Canada Mortgage and Housing Corporation (CMHC) or special-purpose bonds.
3. This approach needs clear linkages to investment and funding (Solution 2) and standards and enforcement (Solution 4). For buildings in severe disrepair, the Chicago example points to strong efforts to enforce repairs by the owner, before acquisition by the courts and the city. There should be resources available to incentivize a private owner to carry out repair work as a first step.

4. This approach may require more legal powers. For example, discussion at the February 21st lab included legal powers for the City to exercise a Montreal-style 'right of first refusal' when such a property is offered for sale, or powers to purchase in cases of severe disrepair.

Participants in the next phase of the project may wish to consider to what extent non-profit (or public) ownership can also serve broader and longer-run objectives through a different business model. Instead of maximizing return on investment, or disinvesting by taking profits while running the asset down, non-profit ownership can ensure that a suitable portion of rent revenues goes to repair and retrofit and can prioritize healthy environments for residents.

Solution 2: Investment and Funding

Investment and funding – As identified by participants in the Lab:

<u>Objective</u>

To create a new means to access low-interest funding for repairs, renovations, or retrofits to improve the health of buildings

<u>Concept</u>

Establish a centralized place where building owners can easily apply for needed funding. This place or 'building bank' could be located within CMHC. If funding is received, then above-guideline increases could not be implemented.

<u>Actions required</u>

1. Base the program Germany's *Kreditanstalt fur Wiederaufbau* (KfW) Bank.

2. Establish criteria for obtaining a loan, for example:
    - Encourage deep retrofits or extensive repair
    - Engineers benchmark buildings to recommend solutions
    - If owners choose deep retrofit, part of the loan could turn to a 'grant'
    - Cosmetic renovation in common areas should not be eligible

3. Promote data for supporting benefits of retrofits through investment

4. For tax purposes, the cost of deep retrofits should be 'written off', not considered only an 'improvement'

5. Determine who will lead this project. CMHC and Tower Renewal Partnership were mentioned as the most likely.

<u>Rationale</u>

There is currently confusion about how owners can access funding for repairs and renovations. Different funding arms have different criteria. There are sometimes difficult criteria and complex application processes.   If there was less confusion, owners would apply.

The KfW is a German federal bank that is well developed and successful, making it an excellent model to adopt.

Investment and Funding: Context, Explanation and Rationale

The focus of discussion at the February 21st Lab was on the feasibility of adopting the model of Germany's KfW.[5] This bank, owned by the federal and state governments, provides loan financing administered through conventional lenders. It has a focus of is energy and climate retrofit, with a careful process to determine work to be done and standards to be achieved for each property. Subsidized interest rates are as low as 0.75 percent, with high per-unit loans, favourable borrower conditions, and long repayment periods. Up to 30 percent of the loan is forgiven if energy standards are met. Work that achieves higher standards can access relatively larger loans. This approach is among those recently suggested to CMHC.[6]

In addition to the KfW model, other new forms of funding and financing could offer resources on a larger scale than what currently exists to improve the state of repair and long life of rental apartment buildings <u>and</u> implement climate and energy goals. Like the KfW model, a recipe is needed that works for private landlord business models, does not impair asset values or investment returns, and supports work that has longer payback periods. A well-designed program can balance the need for major investment in repair and retrofit with the need to keep rents affordable to tenants. The idea is to tie carrots and sticks together to achieve healthy buildings with extended lifespans.

Major repair and retrofit costs per unit often exceed what can be supported in landlords' revenue streams and business models.[7] For most landlords, it does not make business sense to take out loans or inject equity because this might reduce profits. The same applies to retrofit that has very long payback – i.e., where costs cannot be recovered for many years.

The City's *High-Rise Retrofit Improvement Support Program* (Hi-RIS),[8] administered by the Tower and Neighbourhood Revitalization Unit remains small in scale, as does the *Toronto Renovates* program. As the lab participants pointed out, the *National Housing Co-Investment Fund (Repair and Renewal Stream)* has a complicated application process and stringent environmental and accessibility standards and has not yet proven useful for most private landlords' repair or retrofit needs.

Precedents and examples of this approach

In addition to the City of Toronto programs referenced above, there are many precedents of public funding or policy that enables better access to financing, to help with repair and retrofit needs. The participants in the workshop identified KfW as one funding mechanism and this Solutions Lab jurisdictional scan documents other examples. These include tax incentives, such as reduced VAT (similar to HST) for some energy work in the United Kingdom, as well as 'Eco-loans' in France and large-scale loans from an inter-municipal bank in Sweden. Precedents in the US include federal programs which permit flexible local use of these for repair and retrofit purposes among other priorities.[9]

Historically, government funding and financing for housing purposes has taken various forms. These include direct grants and forgivable loans, often passing on low government borrowing rates to housing clients and offering favourable terms and conditions. Other approaches have included loan guarantees, mortgage insurance, blended public-private financing, collaboration with locally-based financial

institutions, and tapping environmental financing sources. Tax measures have included accelerated depreciation, corporate tax credits,[10] property tax reductions, and exemptions from municipal fees. In Canada, such programs have been delivered by CMHC, the federal Department of Finance, conventional lenders, provincial ministries and housing agencies, and municipalities.

What this approach would involve

The complexity of the problem points to a need for careful program development to arrive at a model that works well for private landlords and with local initiatives.

Implementing a KfW model in Canada would require federal policy and funding decisions. A large-scale option such as this would require federal policy and funding decisions and may require a federal lead, or possibly a federal process in dialogue with the City, the Tower Renewal Partnership, and other municipalities.

Other forms of repair and retrofit funding and financing could also be considered. Attention could be given to modifying or enhancing existing investment and funding programs, including the largest current source of funding and below-market financing, CMHC's National Housing Co-Investment Fund (Repair and Renewal Stream). Other options could include things that can be done locally. This could include enhancements to the Hi-RIS and *Toronto Renovates* programs.

Solution 3: Enhanced Tenant Capacity

Enhanced Tenant Capacity – As identified by participants in the Lab:

Concept

Building up and out from existing associations by connecting more tenants across the city so that tenants know their rights and can be an active and equal partner, working with city, stakeholders, and building owners to find solutions to issues.

Objective

To establish one powerful tenant voice across the city so that education and capacity of tenants can be increased

Actions Required

1. Establish a program that takes the form of a 'tenant hub' in two wards with the 'worst' buildings to establish 'proof of concept'.

2. A 'tenant hub' requires a neutral location or tone with opportunities for property managers to get assistance, particularly education as well – including owners and managers of secondary rentals

3. Establish a committee or council to oversee this initiative that consists of building owners, city staff, tenant leaders and other stakeholders at the table

4. City or relevant stakeholders to provide community development activities in communities that need assistance
   a. Create a list of all existing tenant associations to know what communities have no associations and where support should be offered first.
   b. City or relevant stakeholders to provide mentoring to existing leaders, to encourage the spread of a knowledgeable, empowered tenant voice

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Enhanced Tenant Capacity: Context, Explanation and Rationale

Tenants and tenant-serving organizations play critical roles in repair and retrofit issues. Tenants need to know and assert their rights; they need to respond to and work with landlords. Tenant-serving organizations need to press for effective action and be an active partner in solutions.

Action by tenants happens at various geographic scales. In individual buildings, tenants need to organize and press for responses to repair issues. They need legal advice and representation at the Landlord and Tenant Board. At a citywide level, a strong tenant voice is essential to keep rental repair and retrofit issues as a political priority.

Key roles are played by community legal clinics, FMTA with its tenant hotline and support to local tenant associations, and ACORN in its organizing efforts. FMTA and ACORN have also been strong voices on policy issues. Although legal clinics are supported by the province, and the City supports FMTA's hotline and organizing for above-guideline rent increases, but the needs are much larger than current resources can support. Actions at the local district level are also important. Many activities already happen at this level, including legal clinics, neighbourhood initiatives for action on housing, and tenant networks or unions such as those in York South-Weston and St. Paul's.

Precedents and examples of this approach

Other cities more forceful action and municipal support on tenant issues. New York City has a strong Tenant Response branch, which knocks on doors, takes building complaints, and offers legal assistance. Vancouver is on track to establish a 'Renter Centre' in 2021 to improve city services for renters. It will be a centralized one-stop-shop to offer supports, advocacy and educational resources and will couple with the Public Legal Education Society. It will also partner with the provincial Residential Tenancy Branch and other non-profit advocacy groups.

What this approach would involve

Discussion at the Lab focused on establishing tenant Hubs at a district level, with related citywide actions.

A Hub would be a physical facility and perhaps, but not necessarily, a special-purpose organization. It would be a resource centre where tenants and their associations could access advice, assistance with organizing, and response from the City. It would be a focal point for community development and mentoring of tenant leaders. The Hub should be a neutral location with opportunities for property owners and managers to get assistance as well – including for secondary rentals.

A pilot program, to establish 'proof of concept', could be established in two wards, preferably in a ward with some of the buildings in the worst condition.

Citywide support would be needed. A committee or coalition body would be formed to oversee this initiative, with building owners, city staff, tenant leaders and other stakeholders at the table. A citywide list of all existing tenant associations would be created, to identify what local communities have larger

gaps where support from citywide efforts should be targeted. Active participation by FMTA, ACORN and other key organizations would be essential.

Solution 4: Standards and Enforcement

Standards & Enforcement – As identified by participants in the Lab:

Concept

Ensure there is adequate and appropriate enforcement of building standards to improve building quality

Objectives as identified by Participants

To identify standards for a healthy building and healthy residents so they can be tracked and enforced.

To identify standards for tracking improvement and enforcement.

Actions Required

1. Identify, understand and consolidate the complexity of standards related to climate change, property standards, building codes, codes for retrofit and safety, etc.

2. Engage structural engineers to dialogue with building owners and tenants to determine what is a 'good' building

3. Establish and communicate the best practices of successful buildings

4. Use data, such as RentSafeTO, ESA Risk Assessment Tool, and other available information, to determine what makes a building high risk for catastrophic failure or detrimental to community well-being

5. Concentrate on the bottom 25 per cent of buildings that are deemed 'high risk' to ensure enforcement of all existing standards

6. Include long-term resiliency of buildings in any future standards and enforcement program.

Standards and Enforcement: Context, Explanation and Rationale

Codes and enforcement to ensure adequate physical standards in new and existing buildings are fundamental parts of the government's role to ensure health and safety, achieve environmental and climate change goals, and support good conditions of life for residents.

The City, tenants, landlords and others have recognized a need for more effective standards and enforcement to address today's challenges. Society faces a new urgency on climate change and environmental issues. Compared to a generation ago, Toronto has more old buildings and lower-income tenants, more disrepair, and major fires and system failures in rental buildings due to age and disrepair.

The City has taken steps in enforcement with the RentSafeTO program, initiated two years ago in response to advocacy by ACORN and allied tenant voices. The provincial Electrical Safety Authority (ESA) has become actively involved following the recent catastrophic fires in St. Jamestown. But tenants believe that RentSafeTO inspections are not addressing all issues, likely because resources remain modest compared to the scale of the problem. Stronger collaboration between the City and ESA is in its early days. There is not yet widespread implementation of building condition audits, evidence of multi-year capital plans at the building or portfolio level, or related City requirements and monitoring. While the Tower Renewal program at the City has developed and spread knowledge of good practices and assisted this financially, these ideas have not yet spread beyond the several dozen most interested landlords.

Precedents and examples of this approach

There are precedents in other jurisdictions that could provide lessons in strengthening standards and enforcement. In Boston, public health officers can take the role of building inspectors when a person's health is at risk as a result of sub-standard housing. In England, national legislation provides the standards of quality housing through the Housing Health and Safety Rating System – an evaluative tool that all municipalities are expected to follow. Building owners or managers that fail in their duty to provide adequate housing are identified on a publicly accessible 'rogue landlord' database and can be banned from renting accommodation.

In Chicago, through the *Troubled Building Initiative*, the worst performing buildings are the focus of city attention using an integrated approach. Six city departments work together to address private rental buildings that are 'persistently troubled' and come to their attention because of complaints, inspections, and code violations.

What this approach would involve

Discussions among stakeholders at the February 21st Lab focused on 'bad' buildings – those in more severe disrepair – and how to enforce standards as well as adapt lessons from 'good' well-maintained buildings.

To address the 'bad buildings', it is necessary to concentrate on RentSafeTO's lowest scoring buildings, (perhaps the lower 25 per cent,) or those assessed as being at 'high risk' of experiencing fires or a failure

of building systems. (Data exists that can be used to determine what creates high risk for catastrophic failure or for physical conditions that would be detrimental to residents' well-being, and what buildings are at risk. This data includes RentSafeTO and fire inspection reports, public health data, electrical and elevator inspections, building audits by consulting engineers, and other sources.)

As participants pointed out, the second part of this approach would be to document the practices of the best-performing landlords, buildings, or portfolios, and then use this information to create standards to apply to the poor-performing cases. Such standards would not only address safety and disrepair but could also promote resiliency in terms of environmental and climate change goals.

This process would require an enhanced dialogue among key players – the Tower Renewal Partnership, other building science experts or engineers, building owners and managers, tenants, and the City. City departments could include Fire Services, Municipal Licensing and Standards, the Housing Secretariat, and the Tower and Neighbourhood Renewal Unit.

5. Next Steps

This report describes the leading options emerging in Phase III of the Solutions Lab process.

The final phase of this project will 'prototype' and confirm the details of the four chosen solutions which will be the subject of a later report from this Solutions Lab.

Participants in the Lab saw a critical need to develop a process for ongoing stakeholder collaboration. This need emerged strongly in the Phase III Labs, and related discussions in March. It is expected to be an integral part of the Phase IV work and the emerging directions on how to implement and move forward the preferred options agreed on in this Solutions Lab.

Endnotes

[1] Kate Murray (forthcoming), Creating Healthy Housing Quality in the Private Rental Sector: An International Jurisdictional Review (Toronto: Wellesley Institute).

[2] City of Chicago (2019), "The City's Troubled Building Initiative Renovates and Preserves Deteriorating Apartments," HUD Office of Policy Development and Research (accessed August 11, 2019). https://www.huduser.gov/portal/casestudies/study-043018.html

[3] City of Montreal (2020), "Pre-emptive Right," (accessed March 12, 2020). https://montreal.ca/en/topics/pre-emptive-right

[4] CBC News, "City of Montreal to exercise right of first refusal to turn properties for sale into social housing," Posted February 19, 2020. https://www.cbc.ca/news/canada/montreal/right-of-first-refusal-social-housing-1.5466347

[5] Tower Renewal Partnership (2017), German Retrofit Financing (case study). http://towerrenewal.com/research-reports/german-retrofit-financing/

[6] Centre for Urban Growth+Renewal and Tower Renewal Partnership (2019), Tower Renewal and Retrofit Finance (Canadian Housing Policy Roundtable), 7-9, 78-79. http://towerrenewal.com/research-reports/tower-renewal-and-retrofit-finance

[7] Centre for Urban Growth+Renewal and Tower Renewal Partnership (2019), Tower Renewal and Retrofit Finance (Canadian Housing Policy Roundtable), p 4. http://towerrenewal.com/research-reports/tower-renewal-and-retrofit-finance

[8] https://www.toronto.ca/community-people/community-partners/apartment-building-operators/hi-ris 6

[9] Kate Murray (forthcoming), Creating Healthy Housing Quality in the Private Rental Sector: An International Jurisdictional Review (Toronto: Wellesley Institute).

[10] On tax credits, see Centre for Urban Growth+Renewal and DKGI (2019), Federal Green Housing Measures: Renewal & Affordability, 35-37. http://towerrenewal.com/research-reports/federal-green-housing-measures-renewal-affordability