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Jean Swanson, Councillor
Michael Wiebe, Councillor

City of Vancouver
453 West 12th Ave
Vancouver, BC V5Y 1V4

Via Email

November 15, 2021

Dear Mayor & Council.

**RE: Vacancy Control Regulations in Single Room Accommodation
Designated Properties**

On behalf of the BC Poverty Reduction Coalition, First United Community Ministry Society, Homelessness Services Association of BC, and Pivot Legal Society, we write ahead of Council's upcoming decision regarding vacancy control in Vancouver's single room accommodation (SRA) properties. Specifically, we urge Council to heed the recommendations outlined in Vacancy Control Regulations in SRA Designated Properties¹ so as to begin addressing the City's legacy of homelessness, eviction, displacement, and gentrification in the Downtown Eastside (DTES).

For years, organizations such as Pivot have fought for the rights of residents of single room occupancy (SRO) hotels in the DTES. Frustratingly, the City has taken few concrete steps to protect these and other low-income residents in the neighbourhood. Instead, it has actively

¹ Celine Mauboules & Sarah Hicks, "REPORT: Vacancy Control Regulations in Single Room Accommodation (SRA) Designated Properties" (November 4, 2021), online: <https://council.vancouver.ca/20211117/documents/pspc5.pdf>

contributed to gentrification in the DTES via ‘social mix’ developments, zoning changes, tax breaks, and other incentives for landlords and developers. It has broken its promise to build 100% welfare/pension-rate housing at 58 West Hastings, and continues to displace poor people from public parks, despite an absence of housing and shelter options.

As the Special Report on Housing underscored some 13 years ago: “the erosion of affordable housing in the Downtown Eastside – particularly evictions from [SROs] – must be halted immediately”². This is true today more than ever, as evictions from SROs continue to drive homelessness and unaffordability in the DTES, documented extensively in studies like the annual Hotel Reports by Carnegie Community Action Project (CCAP)³. Fortunately, the City now has an opportunity to take some long-overdue action.

The Need for Vacancy Control in Single Room Accommodations

Earlier this year, Metro Vancouver was named the “eviction capital” of Canada, based on a 10.5% eviction rate of renter households in Metro Vancouver.⁴ Residents of SROs in the DTES, many of whom live at “the intersection of drug laws, housing policies, gentrification, and social marginalization,” are rendered “structurally vulnerable” to eviction due to shortcomings in existing residential tenancy law⁵.

Tenants of SROs have very little protection from predatory landlords. While the maximum monthly shelter allowance for person receiving Income Assistance is \$375⁶, rent in privately-owned SROs is well above that rate - on average, \$663 a month based on 2018 data⁷. As CCAP noted in its 2018 report, “since ‘shelter rate’ is still \$375, an immediate 77% increase would be required for someone receiving social assistance to attain even the simplest, one-room, washroom-less residence in hotels that are often poorly maintained and run by slumlords”⁸.

We know that losing housing means losing lives: a 2019 review of deaths of homeless people from 2007-2016 noted 175 deaths of homeless individuals throughout BC, a 140% increase from 2015⁹. In addition to mortality, lack of affordable housing means that members of our community must rely on public space and shelter on sidewalks or in tent cities, where they are subject to

² Pivot Legal Society, “Special Report on Housing Solutions for the Downtown Eastside” (2008), at page 28, online: http://d3n8a8pro7vhmx.cloudfront.net/pivotlegal/legacy_url/284/HousingSolutions.pdf?1345765621

³ Carnegie Community Action Project, CCAP’s Annual Housing Reports, online: <http://www.carnegieaction.org/housing-reports/>

⁴ Silas Xuereb, Andrea Craig & Craig Jones, “Understanding Evictions in Canada through the Canadian Housing Survey” (September 2021), online: https://housingresearch.ubc.ca/sites/default/files/documents/understanding_evictions_in_canada_2021.pdf

⁵ Taylor Fleming et al, “Housing in crisis: A qualitative study of the socio-legal contexts of residential evictions in Vancouver’s Downtown Eastside” (September 2019), Int J Drug Policy 71, online: <https://pubmed.ncbi.nlm.nih.gov/30926217/>

⁶ Government of BC, “Income Assistance Rate Table” (October 1, 2021), online: <https://www2.gov.bc.ca/gov/content/governments/policies-for-government/bcea-policy-and-procedure-manual/bc-employment-and-assistance-rate-tables/income-assistance-rate-table>

⁷ Carnegie Community Action Project, “Displaced: Rents And The Rate Of Change In The Downtown Eastside” (2018), online: http://www.carnegieaction.org/wp-content/uploads/2019/06/FINAL-190611_CCAP-SRO-Hotel-Report-2018-1.pdf at page 2

⁸ *Ibid.*

⁹ Coroners Service, “Reportable Deaths of Homeless Individuals, 2007 - 2016” (March 21, 2019), online: <https://www2.gov.bc.ca/assets/gov/birth-adoption-death-marriage-and-divorce/deaths/coroners-service/statistical/homeless.pdf>

displacement at the discretion of police officers, bylaw officers, and park rangers. While implementing vacancy control cannot address all of the conditions that foment homelessness and precarious housing, it is a simple tool that will ensure no further units of housing are lost to gentrification and rapidly-rising rental rates.

The National Housing Strategy Act recognizes that adequate housing is a fundamental human right affirmed in international law; and that housing is “essential to the inherent dignity and well-being of the person and to building sustainable and inclusive communities.”¹⁰ This recognition of the Right to Housing has also been enshrined in international human rights law, including by the United Nations High Commissioner for Human Rights who states that every person’s right to adequate housing includes security of tenure.¹¹ Ensuring vacancy control in the DTES aligns with recent federal legislation, as a municipal policy that enshrines the right to housing.

Implementing vacancy control in Vancouver’s current SRO stock is one step toward upholding these rights, through preventing homelessness and ensuring this last-resort housing stock remains accessible for those who depend on it. While the City may not be able to increase Income, Disability, and Pension rates or shelter allowances for SRO tenants, the bare minimum it can do—and should do, in harmony with federal law—is prevent residents from being forced into homelessness via eviction and unreasonable rent increases.

Prevent Homelessness & End Displacement

We urge Vancouver’s Mayor and Council to adopt the recommendations set out in the Report to Council and hope that you will further lobby the Province and Minister of Housing to implement vacancy control in rental housing throughout BC. All levels of government must commit to protections that ensure all low-income tenants, living in SROs and other forms of accommodation, can find housing in safe, dignified, and affordable shelter- and pension-rate housing.

Lastly, we call on the City to commit to ending the displacement of tenants from the DTES and other low-income neighbourhoods. This includes ending predatory evictions, street sweeps, tent city evictions, and the enforcement of bylaws that target people who rely on public space.

Sincerely,

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¹⁰ *National Housing Strategy Act*, SC 2019, c. 29, at section 4.

¹¹ Office of the United Nations High Commissioner for Human Rights & UN Habitat, “The Right to Adequate Housing” (May 2014), online: https://www.ohchr.org/documents/publications/fs21_rev_1_housing_en.pdf

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