

#1

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Thursday, April 05, 2018 12:00:51 PM  
**Last Modified:** Thursday, April 05, 2018 12:22:41 PM  
**Time Spent:** 00:21:50

---

## Page 2: Proposed Standards of Maintenance Bylaw

**Q1** What do you feel are the strengths of the proposed Standards of Maintenance Bylaw?

That it gives council a tool to use against the handful of bad landlords.

---

**Q2** What do you feel are the weaknesses of the proposed Standards of Maintenance Bylaw?

That it may unwittingly encompass other landlords who though well intentioned, may not have the same rights through existing tenancies that we would in our leases.

---

**Q3** Do you have any other suggestions or comments regarding the proposed Standards of Maintenance Bylaw?

None

---

## Page 3: Tenant Assistance Policy

**Q4** What do you feel are the strengths of the proposed Tenant Assistance Policy?

That it provides more than the RTA when it comes to notice and compensation as well as assists in finding alternative housing

---

**Q5** What do you feel are the weaknesses of the proposed Tenant Assistance Policy?

The 3 month free rent period is too long. The vagueness of the moving expense section, this should have a value and be capped at \$500 per unit. The right of first refusal at 10% below the starting rent is too high and too vague. What does starting rent mean? If you require landlords to provide the unit at a discount after the work has been done, the financial viability of undertaking such upgrades will not work.

---

**Q6** Do you have any other suggestions or comments regarding the proposed Tenant Assistance Policy?

Yes. I would urge you to revise the free rent period to 2 months free rent, I would recommend the coverage of moving costs up to \$500 regardless of whether someone is identified or "self identifies" as vulnerable, and I would remove the 10% reduction on the right of first refusal and just make it a right of first refusal.

---

## Page 4: Energy and Seismic Upgrade Incentive Bundles

**Q7** What do you feel are the strengths of the proposed Energy and Seismic Upgrade Incentives?

To improve energy performance and seismic resiliency within existing multi-family residential buildings.

---

**Q8** What do you feel are the weaknesses of the proposed Energy and Seismic Upgrade Incentives?

There doesn't appear to be a business case to be made as to why a landlord would enter into such strict requirements under this policy. I personally, would not bother with participating in this program with what you are proposing. Where is the big incentive for the landlord to expend all this capital, agree to restrictions and make any return on their investment?

---

**Q9** Do you have any other suggestions or comments regarding the proposed Energy and Seismic Upgrade Incentives?

I believe that while the intent is good, the fundamentals do not support a landlord participating in this with few exceptions. I believe this will ultimately be a program that doesn't garner much value to the majority of tenants it seeks to assist. If the incentives provided met or exceeded the cost, time and risk associated with undertaking these kinds of improvements, I believe the program could be a success. In the meantime, it's a waste of time.

---

Page 5: Other comments or suggestions

**Q10** Do you have any other comments or suggestions related to the Market Rental Revitalization Study?

No

---

## #2

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Thursday, April 05, 2018 3:12:08 PM  
**Last Modified:** Thursday, April 05, 2018 4:44:27 PM  
**Time Spent:** 01:32:19

---

Page 2: Proposed Standards of Maintenance Bylaw

**Q1** What do you feel are the strengths of the proposed Standards of Maintenance Bylaw?

Respondent skipped this question

---

**Q2** What do you feel are the weaknesses of the proposed Standards of Maintenance Bylaw?

Respondent skipped this question

---

**Q3** Do you have any other suggestions or comments regarding the proposed Standards of Maintenance Bylaw?

How does the landlord get repaid for the cost of upgrades? Incentives by Fortis, tax holidays, etc. will not be nearly sufficient. Full elevator replacement could take six months out of service.

---

Page 3: Tenant Assistance Policy

**Q4** What do you feel are the strengths of the proposed Tenant Assistance Policy?

Policy targeted to vulnerable tenants as opposed to all tenants. Many tenants don't need relocation assistance or have difficulty finding alternate accommodation in the marketplace.

---

**Q5** What do you feel are the weaknesses of the proposed Tenant Assistance Policy?

Need more focus on relocating tenants since staying in place is not feasible due to presence of asbestos when ripping out drywall, plus disruption of service due to upgrading water, sewer, heating, electrical, etc.

Right of first refusal with 10% reduction (FROM MARKET RENT, OR OLD RENT?) in starting rent

---

**Q6** Do you have any other suggestions or comments regarding the proposed Tenant Assistance Policy?

**Respondent skipped this question**

---

Page 4: Energy and Seismic Upgrade Incentive Bundles

**Q7** What do you feel are the strengths of the proposed Energy and Seismic Upgrade Incentives?

**Respondent skipped this question**

---

**Q8** What do you feel are the weaknesses of the proposed Energy and Seismic Upgrade Incentives?

**Respondent skipped this question**

---

**Q9** Do you have any other suggestions or comments regarding the proposed Energy and Seismic Upgrade Incentives?

Again, how does the landlord get reimbursed for the cost of these upgrades? Highly unlikely that incentives will be sufficient.

---

Page 5: Other comments or suggestions

**Q10** Do you have any other comments or suggestions related to the Market Rental Revitalization Study?

Needs to be more recognition of the fact that old buildings can't be renovated feasibly or substantially without displacing tenants. Realistically only superficial renovations can be carried out with tenants in place. This is a 10 year solution not a 50 year solution. There should be some recognition of the difference between temporary displacement vs. permanent displacement. Temporary displacement is where the old apartment building is replaced with a new purpose built apartment. Permanent displacement is where the apt is replaced with a condo or commercial.

---

# #3

INCOMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, April 16, 2018 3:10:50 PM  
**Last Modified:** Monday, April 16, 2018 3:32:05 PM  
**Time Spent:** 00:21:14

---

## Page 2: Proposed Standards of Maintenance Bylaw

**Q1** What do you feel are the strengths of the proposed Standards of Maintenance Bylaw?

Focuses on key areas of life-safety and health.  
Instills responsibility outside of the context of a building alternation permit.

---

**Q2** What do you feel are the weaknesses of the proposed Standards of Maintenance Bylaw?

Potential for lost opportunities to improve accessibility, energy and water efficiency as part of the maintenance.

---

**Q3** Do you have any other suggestions or comments regarding the proposed Standards of Maintenance Bylaw?

References the National Fire Code and National Building Code. In fact, the 2018 BC Building Code and Fire Code should be referenced.

---

## Page 3: Tenant Assistance Policy

**Q4** What do you feel are the strengths of the proposed Tenant Assistance Policy?

Focus on vulnerable tenants.

---

**Q5** What do you feel are the weaknesses of the proposed Tenant Assistance Policy?

May require further granularity and a dispute resolution mechanism.

---

**Q6** Do you have any other suggestions or comments regarding the proposed Tenant Assistance Policy?

Respondent skipped this question

---

## Page 4: Energy and Seismic Upgrade Incentive Bundles

**Q7** What do you feel are the strengths of the proposed Energy and Seismic Upgrade Incentives?

Respondent skipped this question

---

**Q8** What do you feel are the weaknesses of the proposed Energy and Seismic Upgrade Incentives?

Respondent skipped this question

---

**Q9** Do you have any other suggestions or comments regarding the proposed Energy and Seismic Upgrade Incentives?

Respondent skipped this question

---

Page 5: Other comments or suggestions

**Q10** Do you have any other comments or suggestions related to the Market Rental Revitalization Study?

Respondent skipped this question

## #4

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, April 16, 2018 9:40:09 PM  
**Last Modified:** Monday, April 16, 2018 11:04:25 PM  
**Time Spent:** 01:24:16

---

Page 2: Proposed Standards of Maintenance Bylaw

**Q1** What do you feel are the strengths of the proposed Standards of Maintenance Bylaw?

The fact that the City of Victoria is actually considering a SOM Bylaw is the strong point.

---

**Q2** What do you feel are the weaknesses of the proposed Standards of Maintenance Bylaw?

The proposed application of the SOM bylaw is absolutely backwards.

To require a tenant to go through the RTB dispute resolution process before filing a complaint with the bylaw officials is contrary to the established provincial regulations.

If the landlord fails to comply with established law (municipal or otherwise) regarding maintenance then the tenant can go to the RTB with the accusations that the landlord has failed to follow the law (such as the SOM Bylaw.)

To ask the tenant to go through the RTB process first is contrary to the tenancy act... 31 (1)

---

**Q3** Do you have any other suggestions or comments regarding the proposed Standards of Maintenance Bylaw?

There are many items of maintenance that could be added to the SOM bylaw but the application of the SOM bylaw seems to be more urgent of an issue at this point.

---

Page 3: Tenant Assistance Policy

**Q4** What do you feel are the strengths of the proposed Tenant Assistance Policy?

Steering developers and landlords towards more responsible consideration for tenants facing displacement is admirable..... the increased 3 month notice for renovations or redevelopment is a great start

**Q5** What do you feel are the weaknesses of the proposed Tenant Assistance Policy?

The TPP doesn't apply to all types of tenancy"s

**Q6** Do you have any other suggestions or comments regarding the proposed Tenant Assistance Policy?

Respondent skipped this question

---

#### Page 4: Energy and Seismic Upgrade Incentive Bundles

**Q7** What do you feel are the strengths of the proposed Energy and Seismic Upgrade Incentives?

Respondent skipped this question

**Q8** What do you feel are the weaknesses of the proposed Energy and Seismic Upgrade Incentives?

Respondent skipped this question

**Q9** Do you have any other suggestions or comments regarding the proposed Energy and Seismic Upgrade Incentives?

Respondent skipped this question

---

#### Page 5: Other comments or suggestions

**Q10** Do you have any other comments or suggestions related to the Market Rental Revitalization Study?

The City of Victoria should be commended for working on these important tenant displacement issues

---

## #5

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, April 17, 2018 12:01:58 PM  
**Last Modified:** Tuesday, April 17, 2018 12:15:02 PM  
**Time Spent:** 00:13:04

---

#### Page 2: Proposed Standards of Maintenance Bylaw

**Q1** What do you feel are the strengths of the proposed Standards of Maintenance Bylaw?

it's a beginning for the city to take some control over the decaying condition of some rental housing, and the unhealthy and unsafe conditions affecting many tenants in victoria

**Q2** What do you feel are the weaknesses of the proposed Standards of Maintenance Bylaw?

the process of developing the bylaw has not had sufficient input from tenants in Victoria; also, there has been no evidence presented that bylaws in other jurisdictions (not just in BC) were considered. It seems that minimal work has gone into the development of the bylaw as the original draft presented to council in November 2017 wasn't altered in any way before it was presented to the focus group. It needs more work!!!

---

**Q3** Do you have any other suggestions or comments regarding the proposed Standards of Maintenance Bylaw?

Tenants need protection when they make bylaw complaints - protection against both retaliation and business decisions to evict for renovations or demolitions. The bylaw needs to be integrated into a tenant protection strategy as well as a strategy to maintain the limited supply of affordable rental housing in Victoria.

---

Page 3: Tenant Assistance Policy

**Q4** What do you feel are the strengths of the proposed Tenant Assistance Policy?

the only strength is that the discussion has begun. I see this policy as paving the road to silence tenants and get them out of the way when the supply of affordable rental housing is being reduced through unnecessary renovations and demolitions.

---

**Q5** What do you feel are the weaknesses of the proposed Tenant Assistance Policy?

Without a framework to protect both the supply of affordable housing and the security of tenure of tenants - particularly in the climate of a low vacancy rate - the policy only serves the interests of the development industry.

---

**Q6** Do you have any other suggestions or comments regarding the proposed Tenant Assistance Policy?

The city needs to develop a comprehensive policy to protect the supply of affordable housing. Otherwise, the existing 'tenant assistance policy' has no meaning for tenants.

---

Page 4: Energy and Seismic Upgrade Incentive Bundles

**Q7** What do you feel are the strengths of the proposed Energy and Seismic Upgrade Incentives?

As rental housing gets older, it does need to be maintained and upgraded, so it's a good idea to look at the specific needs.

---

**Q8** What do you feel are the weaknesses of the proposed Energy and Seismic Upgrade Incentives?

Again, these incentives seem to be presented as piecemeal policy, not part of a larger plan to protect tenants and our housing.

---

**Q9** Do you have any other suggestions or comments regarding the proposed Energy and Seismic Upgrade Incentives?

very little specific information was presented about these incentives, so no

---

Page 5: Other comments or suggestions

**Q10** Do you have any other comments or suggestions related to the Market Rental Revitalization Study?

I felt used by this process. The city staff will get to check off the box that the policies have gone through a consultation process, yet the process was insufficient and flawed.

Asking participants to address the specifics of recommendations in the policy distracts the conversation away from the overall need and effects of what is being proposed. we need to address the big picture first, and then fill in the puzzle pieces after a comprehensive policy has been developed.

---

## #6

### COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, April 17, 2018 1:44:22 PM  
**Last Modified:** Tuesday, April 17, 2018 2:50:26 PM  
**Time Spent:** 01:06:03

---

Page 2: Proposed Standards of Maintenance Bylaw

**Q1** What do you feel are the strengths of the proposed Standards of Maintenance Bylaw?

None.

---

**Q2** What do you feel are the weaknesses of the proposed Standards of Maintenance Bylaw?

Too detailed or vague in many respects, leading to issues with interpretation.

One example is "adequate heating" heating requirement. What is adequate? Is 21 degrees Celsius an adequate indoor temperature when dressed in pants and long sleeve clothing in winter in an apartment ? What if tenant is in shorts and t-shirt indoors in middle of winter and complains 21 degrees is too cold, can landlord ask them to put on clothes or close curtains??

What about older buildings which may have a difficult time reaching more than 21C on coldest winter days?

Fire exist clause:

"• Hallways, stairwells, and exterior areas shall be adequately illuminated to allow for safe passage."

Does this mean that landlords need to upgrade their older buildings which met building code when they were built to new lighting standards in their common areas and stairwells?

What is "adequate"?

A simpler statement would be "must conform to building code at the time of its construction. "Otherwise this may be a large investment for owners to retrofit all common area lighting to newer building code standards.

Also pests clause:

"If pests have infested any building or rental unit, the owner of the land must eliminate the infestation."

Can you add that "and occupants of rental unit shall cooperate with city and building owners in removal of pest if required to do so."

Getting rid of pests requires resident cooperation in many cases, namely cleanliness, behaviour changes and procedures. If a tenant refuses to clean their unit and there are cockroaches it would be impossible to building owner to remove them all. Bed bugs require the



## Market Rental Revitalization Study - Emerging Directions

cleaning or drying with heat of ALL tenant's linens, bedding and clothing, property owner is NOT able to do this, the resident tenant must cooperate.

Loose wording like you have is unworkable in real world and will lead to frustration by all parties.

Ventilation clause:

You do not even know the building code:

"Unless a satisfactory alternative means of ventilation is provided, every habitable room shall have at least one window which can be easily opened."

A BEDROOM DOES NOT REQUIRE A WINDOW IF BUILDING IS SPRINKLERED!!! Few older buildings would have sprinklers, but under new building code, a bedroom can be without a window. So this is a requirement which may not work in some real world examples.

also:

"• Where a system of mechanical ventilation is provided, it shall be designed and installed in accordance with the current National Building Code of Canada." CURRENT building code ventilation requirements may not be the same as when building was built, so are you forcing owners to upgrade their buildings? I did not realize this was the objective of this bylaw.

Elevator clause:

Again, unworkable in real world:

"Elevator shall be out of service for no more than 1 week"

What about the BC Safety authority requirements a few years ago where owners needed to upgrade their elevators, it was a 1 month process! 1 week is crazy and unworkable when required upgrades are being done. Compensation must be offered to tenants when elevator is down, but if an elevator requires replacement due to end of life issues for major components, it may be down for more than 1 week. Has elevator companies been consulted to find out the "average large upgrade down time?"

"Proposed application clause":

Private landlords are not social housing agencies, please understand this.

Private landlords are not social housing agencies, please understand this.

Private landlords are not social housing agencies, please understand this.

Sorry for the repetition, but your requirements are making it harder for landlords to accept any of these named "categories" of tenants. These sorts of clauses will simply make rental housing more expensive to build, hereby defeating its own goals of protecting renting housing. It will cause more condos to be built, not more rental and will protect status quo and keep rents higher in existing buildings.

Lastly, TENANT IMPLICATION:

Cleanliness: Tenancy act requires that rental premises be kept "reasonably clean". Your program is aimed at property owners, but what about individual responsibility where tenant's neglect damages the unit and cause mould, does not report leaks, brings in pests, and so on. A part on resident education would be greatly appreciated. I regularly get complaints of tenants who complain of dirty carpet but do not own a vacuum cleaner, or mould on bathroom walls but are too lazy to wash their bathroom walls and do not use bathroom fan. How is landlord responsible for this!

I suggest a rewording to be better thought out than this draft proposal full of holes and pitfalls!

---

**Q3** Do you have any other suggestions or comments regarding the proposed Standards of Maintenance Bylaw?

I am livid when I see the proposed wording and application.

NOT what was discussed around the table.

---

Page 3: Tenant Assistance Policy

**Q4** What do you feel are the strengths of the proposed Tenant Assistance Policy?

None, will simply make rental housing more difficult to built. So what if someone wants to demolish 10 rental units to build 30. It should just be a simple formula where replacement of say 3 or 4 new ones to 1 old one is allowed, nothing less, balance can be condos. This would encourage greater density and vitality in Victoria's urban environment and supports local businesses in the area. 2 storey walk up buildings have no place in dense areas and so replacing them with 4 to 6 storey buildings with more units would make Victoria a more dense and greener city.

---

**Q5** What do you feel are the weaknesses of the proposed Tenant Assistance Policy?

It will simply make rental housing more expensive. More barriers to entry created hence protecting the incumbent landlords and property owners, which in my self serving interest is great.

---

**Q6** Do you have any other suggestions or comments regarding the proposed Tenant Assistance Policy?

Keep only the extra notice requirement and add a 3 or 4 to 1 unit replacement for demolishing old rental buildings to replace them with new rental buildings.

---

Page 4: Energy and Seismic Upgrade Incentive Bundles

**Q7** What do you feel are the strengths of the proposed Energy and Seismic Upgrade Incentives?

Seems ok

---

**Q8** What do you feel are the weaknesses of the proposed Energy and Seismic Upgrade Incentives?

Respondent skipped this question

---

**Q9** Do you have any other suggestions or comments regarding the proposed Energy and Seismic Upgrade Incentives?

Be careful it not be worded to reward bad behaviour in property owners. ie: incentives to repair neglect.

---

Page 5: Other comments or suggestions

**Q10** Do you have any other comments or suggestions related to the Market Rental Revitalization Study?

Respondent skipped this question

---

#7

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, April 17, 2018 3:50:12 PM  
**Last Modified:** Tuesday, April 17, 2018 4:08:14 PM  
**Time Spent:** 00:18:01

---

## Page 2: Proposed Standards of Maintenance Bylaw

**Q1** What do you feel are the strengths of the proposed Standards of Maintenance Bylaw?

There are no strengths regarding an unnecessary due to very few landlords who do not maintain similar basic standards

---

**Q2** What do you feel are the weaknesses of the proposed Standards of Maintenance Bylaw?

This bylaw if promoted by the city will create another level of bureaucracy that could easily be abused by tenants while these standards are already enforced under the RTA

---

**Q3** Do you have any other suggestions or comments regarding the proposed Standards of Maintenance Bylaw?

Not needed!

---

## Page 3: Tenant Assistance Policy

**Q4** What do you feel are the strengths of the proposed Tenant Assistance Policy?

no comment

---

**Q5** What do you feel are the weaknesses of the proposed Tenant Assistance Policy?

no comment

---

**Q6** Do you have any other suggestions or comments regarding the proposed Tenant Assistance Policy?

no comment

---

## Page 4: Energy and Seismic Upgrade Incentive Bundles

**Q7** What do you feel are the strengths of the proposed Energy and Seismic Upgrade Incentives?

Need more time to comment

---

**Q8** What do you feel are the weaknesses of the proposed Energy and Seismic Upgrade Incentives?

need more time to comment

---

**Q9** Do you have any other suggestions or comments regarding the proposed Energy and Seismic Upgrade Incentives?

need more time to comment

---

Page 5: Other comments or suggestions

**Q10** Do you have any other comments or suggestions related to the Market Rental Revitalization Study?

already stated

---

#8

COMPLETE

<b>Collector:</b>	Web Link 1 (Web Link)
<b>Started:</b>	Tuesday, April 17, 2018 9:22:36 PM
<b>Last Modified:</b>	Tuesday, April 17, 2018 9:52:47 PM
<b>Time Spent:</b>	00:30:10

---

Page 2: Proposed Standards of Maintenance Bylaw

**Q1** What do you feel are the strengths of the proposed Standards of Maintenance Bylaw?

Very focused on basic needs and thus, there should be no pushback on the merits of the requirements.

---

**Q2** What do you feel are the weaknesses of the proposed Standards of Maintenance Bylaw?

Some of the measures may require subjective interpretation by the RTB Arbitrators. For example, those measures that specify, "...adequate...". It would be better to provide a little more granularity and detail to ensure that the requirements are clear. This could be written like building code language, making it more objective. This language could be provided in the bylaw, following broad consultation to make sure it is clear and appropriate.

---

**Q3** Do you have any other suggestions or comments regarding the proposed Standards of Maintenance Bylaw?

The policy and bylaws should reference the BC Building and Fire Codes, not National Codes.

---

Page 3: Tenant Assistance Policy

**Q4** What do you feel are the strengths of the proposed Tenant Assistance Policy?

Outside of my expertise.

---

**Q5** What do you feel are the weaknesses of the proposed Tenant Assistance Policy?

Outside of my expertise.

---

**Q6** Do you have any other suggestions or comments regarding the proposed Tenant Assistance Policy?

Outside of my expertise.

---

Page 4: Energy and Seismic Upgrade Incentive Bundles

**Q7** What do you feel are the strengths of the proposed Energy and Seismic Upgrade Incentives?

Focusing on the incremental opportunities beyond common practice. This minimizes "free ridership" and supports longer-term thinking that optimizes the economics for the landlord, tenants and community. I think it is safe to say that common practices for seismic upgrades are minimal to none.

---

**Q8** What do you feel are the weaknesses of the proposed Energy and Seismic Upgrade Incentives?

Studies are required (energy and condition assessment) in all cases to identify the improvement measures. This might be a hurdle that a landlord is unwilling to jump over. This could be alleviated through a partnership with FortisBC to approve energy study funding for all applications, removing the risk for landlords who have had mixed success in accessing the Commercial Custom Program - Retrofit Projects.

---

**Q9** Do you have any other suggestions or comments regarding the proposed Energy and Seismic Upgrade Incentives?

Could there be an alternative "prescriptive" path to access incentives with no studies required for "best in class" upgrades that have deemed savings and other benefits. For energy this could be triple glazed windows. For seismic, this could be reinforced soft-storey using prescriptive guidelines.

---

Page 5: Other comments or suggestions

**Q10** Do you have any other comments or suggestions related to the Market Rental Revitalization Study?

It would be great if the City could explore on title financing (Local Improvement Charges or Property Assessed Clean Energy) that is transferrable between owners. This is common in the USA and has recently been introduced in Alberta. This would require a partnership with the Province of BC.

---