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Dear Planning Committee Members:

Re: Proposed Rental Housing Licensing By-law not the right solution

As a homeowner, I strongly support the enforcement of current by-laws to correct illegal conditions and improve our neighbourhoods. However, I will have to respectfully disagree with the proposal that licensing is the right solution:

- I do believe there are many rental housing issues in Hamilton but almost all of these issues are related to lack of by-law enforcement. We have fire, safety and health... by-laws but we are not enforcing them. So the issue is lack of enforcement, not lack of by-laws.
- When I read the Draft Rental Housing Unit By-law (the Draft), the biggest question come to my mind is the enforcement. Due to the scope of the proposal (includes all rental houses), the proposed 17 FTE will not be enough to enforce this by-law. Irresponsible landlords will do nothing about it and the City won't have enough resources to enforce it. By-law enforcement probably is the key reason that brought us to today's rental housing issues: we have many by-laws but we do not have a focus and effective ways to target and correct the issues.
- Let's assume the city can enforce this by-law, this will create a Loss of Rental Housing up to 30%, which will have a huge impact to our community and we do not have a solution for this potential bigger new issue from this licensing.
- As per the Draft, approval of the City's Urban Official Plan is expected in a year or so, and this Plan will have big impact to this licensing by-law. I have to wonder why we cannot wait until we are clear on the Official Plan, which will reduce the impact of Loss of Rental Housing.
- The city is proposing to add 17 FTE for this program and I would urge the council to reconsider this before add any FTEs to our City Hall during an economy when Ottawa and Queens Park are cutting to balance budgets. The City is proposing to add 17 FTE (minimum \$1,200,000 operating budget for salary, benefits and other expenses) to our operating budget. I would argue this is not a good spending of our taxes. Yes, landlords and tenants will pay the fees but they are, too, taxpayers and the fees will not cover all the expenses of this new program.
- This licensing by-law sends a wrong signal about our city. Hamilton is a city that residents are paying the majority of our property taxes (about 85%). What we really need is to attract businesses, investors and residents to our city to create jobs and build economic prosperity. This by-law is doing the opposite: welcome to Hamilton and let's discuss the detailed regulations and taxes for you doing business here and our priorities are growing the City Hall and "protecting" people. Capitalism, entrepreneurship and economy prosperity are secondary. The reality of our city is that City of Hamilton, university and hospitals are now our biggest employers and residents are paying higher and higher taxes. We have to stop this trend for a better Hamilton!
- Finally, I do not see a strong relationship between the analysis and the recommendation of a housing licensing program in the Draft. I am sorry to say that, like many other public, I see rather a biased report and an agenda from City Hall or the Council to take an opportunity to add a tax and grow the City Hall. I could not see a Subject Matter Expert trying to present a full picture of an issue and recommend the best solution for the interests of taxpayers. For example, the report listed 6 comparative Ontario municipalities, but there are 444 municipalities in Ontario and even in the top 10 Ontario cities, there are only 3 that have licensing programs. So licensing is in minority, NOT in majority as the Draft indicates. The reasons that Toronto and Ottawa chose not to licensing should be included here for this committee and for the public consideration.

Like any proposal, the key is implementation. We can easily come up with an idea and pass a by-law without consideration of implementation details, and 3 years later, we need to pass another one to repeat the prior failures. I suspect that this report is prepared with the housing licensing in the mind from the beginning and all analysis / document are gathered around that mind. In my personal view, it's inappropriate for the City to add another layer of tax and add 17 FTE to the city hall with no convincing argument to support the recommendation and with so many outstanding issues up in the air.

I would suggest we do the following to effectively and efficiently manage the housing issues:

- Formalize City-wide Proactive By-law Enforcement Team. Before we pass any new by-law, let's enforce the current by-laws and let's focus on these irresponsible landlords. A housing licensing by-law will not solve our problems as we are not focusing our recourses on these "bad" landlords and the "good" ones are paying the full prices.
- Let's wait a period of 3 years so City's Urban Official Plan will be in place and we will be in a better place to evaluation of the options of a licensing program. If there are strong evidences to support a housing licensing after objective and professional analysis, we should present a strong / convincing business case to the public. And if the intention of this program is for safety and health, we should at lease exempt the owner-occupied properties so we do not lose our focus.

Yours Sincerely,

Jimmy Liu, a resident of Hamilton