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September 30, 2020

To our provincial leaders,

Re: Feedback on Bill 204, Helping Tenants and Small Businesses Act, 2020

The Riverside District BIA, Bloorcourt BIA and Queen Street West BIA are three of Toronto's 80+ BIAs. We collectively represent approximately 600 small and medium sized businesses and property owners.

As one of our local businesses put it: "Commercial rent remains one of the most significant expenses that small and medium sized businesses have in a given month - and also a factor that is a 'make or break' deciding factor as to whether we can continue keeping our business alive".

We would like to provide recommendations toward Bill 204 as follows:

- **RENT ABATEMENT:** CECRA program needs to be retired and a new, improved rent abatement scheme needs to replace it - one that is more equitable and does not pit landlords against tenants and leave the success of a tenant up to the goodwill of a landlord. The application process should be reversely done with the tenant applying and not the landlord. We recommend that the qualifying criteria for loss of revenue be lowered to 30% instead of the current 70% to better reflect the operational reality of small and medium sized businesses. The program should provide 75 per cent commercial rent subsidy for small and medium sized businesses.
- **COMMERCIAL RENT CONTROL SYSTEM:** Rising commercial rents are one of the most critical issues facing small and medium sized businesses, and during this pandemic has been no exception. A key reason for the fragile situation of small and medium businesses coming into this pandemic was the already unaffordable and rising commercial rent environment. A commercial rent control system needs to be brought into play to halt this

out of control situation which has already resulted in an accelerating roster of lifeless vacant commercial properties throughout this province.

- **COMMERCIAL EVICTION/LOCKOUT BAN:** While this system is developed and during this pandemic, a commercial eviction ban must be upheld. **The Commercial Eviction Ban until October 30th needs to be extended until at least September 30th, 2021** (*this provides certainty for business owners and operators to plan ahead and *hopefully* ride out this “second wave” and provide some time for recovery efforts*).

We would welcome and appreciate any further dialogue. Thank you sincerely for your ongoing support of small and medium sized businesses.

On behalf of the Riverside District BIA, Bloorcourt BIA, and Queen Street West BIA:

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