

Court File No.: CV-25-00000750-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

THE REGIONAL MUNICIPALITY OF WATERLOO

Applicants

- and -

PERSONS UNKNOWN AND TO BE ASCERTAINED

Respondents

2nd SUPPLEMENTAL RESPONDING APPLICATION RECORD

February 20, 2026

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Court File No. CV-25-00000750-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

THE REGIONAL MUNICIPALITY OF WATERLOO

and

PERSONS UNKNOWN AND TO BE ASCERTAINED

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TAB 1

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**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

THE REGIONAL MUNICIPALITY OF WATERLOO

Applicant

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Respondents

APPLICATION UNDER Rule 14.05 of the *Rules of Civil Procedure*

2nd AFFIDAVIT OF MEGAN LOPES

I, Megan Lopes, of the City of Kitchener, in the Province of Ontario, AFFIRM AND SAY:

1. I have personal knowledge with respect to the facts set out below, except where stated otherwise. Where the information is not based on my personal knowledge, it is based upon information provided by others which I believe to be credible and true.
2. I have previously affirmed another affidavit in connection with this matter. My affidavit dated June 18, 2025 was included in the Respondents' Responding Record Vol. 1.
3. In and around September 2025 I was offered a motel room at the Super 8 Motel, located at 650 Hespeler Road, Cambridge, ON N1R 6J8, by the Region of Waterloo.

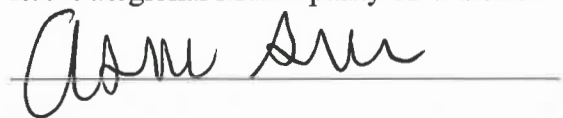
4. I accepted the offer and I was allowed to bring 3 to 4 bags of belongings, a suitcase and my blanket with me. I was provided a cab and I went to the Super 8 Motel by myself from the encampment. I left my tent and mattress at the encampment, as I was not offered storage for these belongings.
5. I stayed at the Super 8 Motel for approximately 3 weeks.
6. I suffer from Mixed Personality Disorder, Attention Deficit Hyperactivity Disorder, Bipolar Disorder, and several other mental health disabilities. Due to my mental health, I struggle with aggression. I also use substances including marijuana and meth.
7. I receive Ontario Works and I have spoken to the housing worker about applying for Ontario Disability Support Program (ODSP) benefits. They were going to help me find a doctor to complete my ODSP application.
8. Earlier this week I had a disagreement with the motel manager and I was kicked out of the Super 8 Motel. The manager called the police and I was arrested. I was released but given a trespass notice and told I could not return to the Super 8 Motel.
9. The first time I had a negative interaction with the manager was because my key card kept deactivating and I kept going to the front desk to have it reactivated. She did not like that this kept happening and she cussed me out.

10. The second time I had an incident with the manager was when she called the police on me. I had just woken up and I was in the lobby in my sports bra. She told me to put on a shirt and I told her I didn't have any clean clothes. Things escalated and we yelled at each other and then she called the police.
11. The manager also alleged that I caused property damage at the motel.
12. In and around Monday, October 6, 2025 I returned to the 100 Victoria St. Encampment as I had nowhere else to go.
13. When I returned to the encampment I discovered that my tent and mattress had been torn and were covered with garbage and rat feces. I was told by the Region's housing worker that my belongings are safe at the Super 8 Motel but I don't know how I will get my belongings back.
14. I feel that my personal circumstances have deteriorated compared to when I left the encampment. Most of my belongings are still at the motel and my belongings at the encampment are damaged. Close friends I relied on for support at the encampment are still at the motel.
15. Region of Waterloo staff have never offered me a permanent housing option. They have only offered me a motel room, they said I could stay there for up to one year.

16. The Region's housing worker is trying to help get me a different motel room. I want to get away from the people at the Super 8 Motel in Cambridge, I don't think it is good for me to be around those people. But I have heard that at the Weber Inn in Kitchener the women that stay there are asked to provide sexual favours to the owner and that is concerning to me.

17. If the Encampment were no longer available, I would have nowhere to go.

AFFIRMED BEFORE ME in the)
City of Kitchener, this 10th day of)
October, 2025)
In the Regional Municipality of Waterloo)



ASHLEY SCHUITEMA,
a Commissioner, etc.,
Province of Ontario,
while a Barrister and Solicitor.
LSO #68257G


Megan Lopes

**THE REGIONAL MUNICIPALITY OF
WATERLOO**
Applicants

and

¹²
**PERSONS UNKNOWN AND TO BE
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Respondents

Court File No.: CV-25-00000750-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

Proceeding commenced at KITCHENER

2ND AFFIDAVIT OF MEGAN LOPES

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Lawyers for the Respondents

TAB 2

Court File No. CV-25-00000750-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

THE REGIONAL MUNICIPALITY OF WATERLOO

Applicant

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Respondents

APPLICATION UNDER Rule 14.05 of the *Rules of Civil Procedure*

AFFIDAVIT OF TERRANCE JOSEPH PATRICK COLE

I, Terrance Joseph Patrick Cole, of the City of Kitchener, in the Province of Ontario, AFFIRM

AND SAY:

1. I have personal knowledge with respect to the facts set out below, except where stated otherwise. Where the information is not based on my personal knowledge, it is based upon information provided by others which I believe to be credible and true.
2. I am a 57 year old male.
3. I had five children, three biological and two step-children. I lost two of my children to mental health struggles and addiction.
4. I am in a relationship with Kari Kuntz.

5. I went to school until grade 12.
6. I worked at Canada Tool Company in Cambridge for 36 years as a maintenance operator, tool & die maker, and millwright.
7. I was abused by close family members and community members as a child. I was sexually abused by a priest as a child in Newfoundland. Because of this I was severely physically and emotionally abused by my father throughout my childhood for being 'queer'. I remember having to eat Christmas dinner in the barn and being whipped with a belt by my father.
8. I suffer from poor mental health and have suicidal ideations. I can become violent and snap because of my mental health conditions.
9. I stopped working about two and a half years ago because of my mental illness, which made it difficult to concentrate and made me clumsy at work.
10. I was receiving Long Term Disability (LTD) benefits but they were recently cut off. I was told I needed to apply for Canada Pension Plan Disability or my LTD benefits would be cut off. I struggled to complete the paper work on time and my LTD benefits have now stopped.
11. I started using cocaine and fentanyl after losing my children. When my step-son died, my wife and I split up.

12. I am trying to get away from drugs and use addiction support programming for counselling and access to suboxone. I use the Rapid Access Addiction Medicine Clinic (RAAM) in Kitchener.
13. I still use fentanyl but in small doses and I'm trying not to. When I use fentanyl I will use with Kari around, she keeps track of when I used and how much so I can stay safe.
14. I have slept in parks and under trees. I have lost all of my belongings while I've been homeless.
15. I have been living at the 100 Victoria Encampment on and off for one and a half years.
16. I stayed at the Bridges shelter in Cambridge about four years ago. I only stayed for a month because I found it too crowded, found it difficult to be around others using drugs, saw too much violence, and had trouble sleeping.
17. I couch surfed at my cousin's apartment for a few months in Cambridge. ^{His father, my cousin,} ~~My uncle~~ lived in the same building and my cousin wanted to move in to ^{his father's} ~~my uncle's~~ unit to take care of ^{him} ~~his father~~. I had to move out then.
18. For approximately 4-5 months I lived in my vehicle. At one point I was pulled over and asleep with the keys in the ignition and I was charged with impaired driving. My vehicle was since stolen and I continue to have a car loan for it that I cannot pay back.

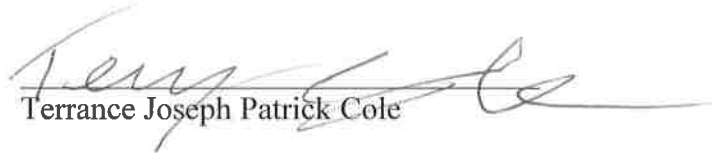
19. For a period of time I lived at Kari's mom's house, but Kari and her mom butt heads and Kari was asked to leave. I left at that time and moved into a tent at the encampment.
20. The encampment at 100 Victoria is located close to services I access for food and treatment. I go across the street for coffee and to the soup kitchen. I also access the hospital, the probation office and the RAAM clinic, which are all nearby.
21. I rely on the donations and harm reduction supplies brought to the 100 Victoria encampment.
22. I do not feel particularly safe at the encampment, even with the security provided, but I have no other options or anywhere else to go. The security would watch you die and not help you. I have been assaulted with bear mace and beaten with a bat and the security has not intervened. My arm is broken in two spots and is not healing properly.
23. My income makes it impossible for me to find affordable housing. You need at least first and last month's rent to get an apartment and I cannot afford it.
24. I have spoken to the Region's unsheltered workers but have been told there is nothing available for me. I believe I am on a waitlist for subsidized housing.
25. I need a shelter option that is available to couples so I can continue to live with Kari.
26. I would stay at a motel if it was offered to me.

27. If 100 Victoria were not available to me I would probably live in a stairwell.

AFFIRMED BEFORE ME in the)
City of Kitchener, this 10th day of)
October, 2025)
In the Regional Municipality of Waterloo)



ASHLEY SCHUITEMA,
a Commissioner, etc.,
Province of Ontario,
while a Barrister and Solicitor.
LSO #68257G



Terrance Joseph Patrick Cole

**THE REGIONAL MUNICIPALITY OF
WATERLOO**
Applicants

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Court File No.: CV-25-00000750-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

Proceeding commenced at KITCHENER

AFFIDAVIT OF TERRANCE COLE

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Lawyers for the Respondents

TAB 3

Court File No. CV-25-00000750-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

THE REGIONAL MUNICIPALITY OF WATERLOO

Applicant

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Respondents

APPLICATION UNDER Rule 14.05 of the *Rules of Civil Procedure*

AFFIDAVIT OF JORDAN CAMM

I, Jordan Camm, of the City of Kitchener, in the Province of Ontario, AFFIRM AND SAY:

1. I have personal knowledge with respect to the facts set out below, except where stated otherwise. Where the information is not based on my personal knowledge, it is based upon information provided by others which I believe to be credible and true.
2. I am a 31 year old male.
3. I suffer from Obsessive Compulsive Disorder, Attention Deficit Disorder and Attention Deficit Hyperactivity Disorder.
4. I rely on Ontario Disability Support Program (ODSP) benefits. I receive around \$800.00 per month.

5. I have in the past used crystal meth, fentanyl and crack. I'm still using meth and fentanyl but my use has slowed down.
6. I am single with one child who is now twelve years old. He lives with his mother in Toronto.
7. The last time I worked was when I was in high school. I worked in an auto mechanic's shop through a co-op class. I helped repair cars that were in collisions.
8. I was kicked out of my mother's home in Kitchener when I was sixteen years old. After I was kicked out I started using drugs. For a few years I stayed at oneRoof on and off, but eventually I aged out, I was too old to stay there.
9. For a while I lived with my son's mother in Cambridge when we were together. We broke up six years ago and I moved out. After that I couch surfed with friends, stayed in shelters, stayed at the encampment at 100 Victoria Street ("Encampment"), slept in alleyways and outside churches. I also stayed at the portable at Lot 42 in Kitchener.
10. I've stayed at the Bridges shelter for a few months, but am not allowed to go back there now. I don't know why.

11. I stayed at the SHIP (Edith Mac) shelter off and on, but I was blamed for a toilet breaking when a pipe blew during the winter of 2024. I was kicked out. I've tried going back but every time they say I'm not allowed to be there.
12. I've stayed at House of Friendship before for a few months, many years ago. I'm not banned from being there, but every time I try to go it is always full.
13. I returned to the Encampment two months ago. The last time I stayed here was for roughly two years from 2022-2024. After that I stayed with a friend on their couch, but they were evicted by their landlord and I had to leave. When I left the Encampment in 2024 I gave my tent to friends to use.
14. In the past I've been assaulted and robbed when sleeping on the streets. I have been hit in the head at least six times. I had my wallet stolen with all my identification, my backpack and money.
15. I like staying at the Encampment because I feel safer here. I like that there are volunteers and security around. I like that people bring by food donations and there is a soup kitchen across the street. I also go to Sanguen Health Centre and Ray of Hope. I feel like if you need help here is it close by.
16. I don't like staying in shelters because of how early you have to get up and leave.

17. I have not been offered a shelter spot or motel room by staff from the Region of Waterloo.

I would like a motel room, I think if I were in a motel I could get better, look for a job and housing. Right now I don't even have identification, so it is hard looking for a place to stay.

18. If the Encampment were closed down, it would impact me pretty badly. I'd have to go back to sleeping in alleyways.

AFFIRMED BEFORE ME in the)
City of Kitchener, this 15th day of)
October, 2025 in the)
Regional Municipality of Waterloo)



ASHLEY SCHUITEMA,
a Commissioner, etc.,
Province of Ontario,
while a Barrister and Solicitor.
LSO #68257G



JORDAN CAMM

**THE REGIONAL MUNICIPALITY OF
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²⁵
**PERSONS UNKNOWN AND TO BE
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Court File No.: CV-25-00000750-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

Proceeding commenced at KITCHENER

AFFIDAVIT OF JORDAN CAMM

WATERLOO REGION COMMUNITY LEGAL SERVICES
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Lawyers for the Respondents

TAB 4

Court File No. CV-25-00000750-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

THE REGIONAL MUNICIPALITY OF WATERLOO

Applicant

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Respondents

APPLICATION UNDER Rule 14.05 of the *Rules of Civil Procedure*

AFFIDAVIT OF JEFFREY LIMA COUTO

I, Jeffrey Lima Couto, of the City of Kitchener, in the Province of Ontario, AFFIRM AND SAY:

1. I have personal knowledge with respect to the facts set out below, except where stated otherwise. Where the information is not based on my personal knowledge, it is based upon information provided by others which I believe to be credible and true.
2. I am a 43 year old male.
3. I have three children. Their ages are 17, 14, and 13. They live in Kitchener with their mom, my ex-wife.
4. I went to school until grade 12.

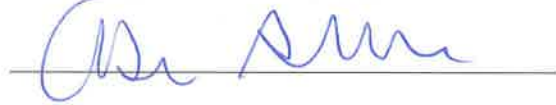
5. I receive Ontario Works of approximately \$700 per month.
6. My father was murdered when I was 20 years old and my brother was 10 years old. I very quickly became a father figure for my younger brother.
7. I was self-employed for 23 years, working in renovations and roofing. I owned a successful small business with ¹⁵ ~~five~~ employees and five trucks.
8. I stopped working in 2021 when I had to shut down my business due to the pandemic and increased mental health challenges. My business was struggling because no one was letting anyone in their house to do renovations or repairs.
9. COVID was really hard on me. I had never used drugs before 2021 and became addicted to cocaine at that time. I got a DUI and could no longer drive my vehicle, which I needed to do for work. I was experiencing a separation from my ex-wife and significant mental illness. My world was falling apart. Before that time I had a career and owned my own home.
10. For a period of time after my separation I was staying at a rooming house, but I couldn't pay my rent there anymore. I first came to the 100 Victoria Street Encampment (the "Encampment") in and around 2021. I also lived here for six months in 2024. After this point I got sober and went to stay with my mom, but have since relapsed. I have been at the Encampment consistently since April 2025.

11. I have been through the detox program at Park Street in Kitchener twice, once in 2024 and once in 2025. Both times I went through the entire rehab program of approximately 18 days.
12. I started using fentanyl this year. I have to use it daily or I will get really sick. I am not on any programs for methadone or dilaudid, but I want to get on those programs so I can stop using fentanyl.
13. At periods of time I will go back to my mom's house. But for three weeks I haven't seen anyone in my family, including my children, because I was beat up recently and my face is destroyed and I don't want them to see me like that. I did see my family on Thanksgiving weekend.
14. The Encampment provides somewhere to go if there are no other options, but I don't want to be here. There are so many rats and it is difficult not to have running water or electricity.
15. I have experienced frost bite in my feet while I've been homeless. I have also had no access to my heart medication in over two years.
16. For periods of time since becoming homeless I have slept on the streets. I have slept at City Hall, Victoria Park, under trees, in bathroom stalls, and at a Tim Hortons before.
17. I have been robbed and assaulted while living on the streets. I was sexually assaulted as a child.
18. I don't have any belongings anymore.

19. The Region's unsheltered workers have never offered me a motel. I would like to be offered permanent housing. I think I am on a waiting list for housing.

20. If the 100 Victoria Encampment were not available to me I would probably be sleeping in a park.

AFFIRMED BEFORE ME in the)
City of Kitchener, this 15 day of)
October, 2025)
In the Regional Municipality of Waterloo)



ASHLEY SCHUITEMA,
a Commissioner, etc.,
Province of Ontario,
while a Barrister and Solicitor.
LSO #68257G



Jeffrey Lima Couto

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AFFIDAVIT OF JEFFREY LIMA COUTO

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Lawyers for the Respondents

TAB 5

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**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

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Respondents

APPLICATION UNDER Rule 14.05 of the *Rules of Civil Procedure*

AFFIDAVIT OF XANDER HARKER

I, Xander Harker, of the City of Kitchener, in the Province of Ontario, AFFIRM AND SAY:

1. I have personal knowledge with respect to the facts set out below, except where stated otherwise. Where the information is not based on my personal knowledge, it is based upon information provided by others which I believe to be credible and true.
2. I am a 27 year old male.
3. I receive ODSP benefits. I do not receive shelter allowance.
4. I suffer from multiple mental health disabilities.
5. I have a long history of substance use disorder. I use many kinds of drugs and alcohol.
6. I have worked in several trades throughout my career. Most notably, I worked at Toyota for three years, and have also worked in retail, shipping and receiving, and loading trucks.
7. I previously lived at the York Apartments in Kitchener, Ontario, but the rent became too expensive for me and my partner. Unfortunately I got into a dispute with my partner and the police became involved. I was arrested and went to jail for several weeks.

8. After being released from jail I was not allowed to return to my home, and began living on the streets.
9. I have been homeless for three years. *this time around. I was also homeless in my teens.*
10. I have stayed in many shelters including Bridges, One Roof, and SHIP, and slept on the streets. *ELM*
11. I found it difficult to remain at these shelters due to some of the rules. I was not allowed to stay at the shelter during the day, and had nowhere else to go. After some time my bed was given away.
12. I stayed at an encampment in Galt (Cambridge, Ontario) with four other people for approximately one year.
13. By-law officers came and evicted us from the site in 2024. They promised to assist us with the move but did not. On the eviction date, they began to throw all of our belongings away.
14. I lost my tools, a valuable jacket, and many of my other belongings.
15. I made a suicide attempt due to the stress I experienced from the eviction.
16. I prefer not to stay in a shelter due to the restrictions and lack of freedom. Some shelter staff have thrown away my belongings in the past, which caused me a lot of stress. *There was also a lot of theft sometimes by the workers too.* *ELM*
17. I feel safer living on the streets.
18. If the 100 Victoria Encampment site was no longer available, it would be mentally distressing and impossible for me to obtain housing in the private rental market, I would not be able to afford rent.
19. The Encampment provides safety and is a place where I can store some of my belongings. Storage is the biggest obstacle when being homeless. I need a place to store my food and essentials.

20. I was unable to store my belongings while I stayed at a shelter. They provided me one bin, which is not enough to store ~~of~~ ^{my} all of belongings. *[Signature]*
21. Some people fill their cars just for a weekend camping trip, yet they do not understand that my bag contains everything that I own, and I have to carry it with me everywhere I go.
22. I have been assaulted while experiencing homelessness. I was assaulted three weeks ago and lost four of my front teeth.
23. I have not stayed in a motel since experiencing homelessness, but I would if it were offered. I do not have any transportation. A motel or any housing option would need to be close to food and other support services so I could access those supports.
24. I was approached twice by Region staff to talk about housing. They did not mention any offers of a motel. I am open to talking to them, but I never heard anything further.
25. I rely on donations and food drop-offs made to the 100 Victoria Street encampment as well as the Community Fridge, St. Johns Kitchen and Ray of Hope. It is very difficult for me to find food and water at nighttime. People from the community come regularly to drop off food and water at the encampment, and this is very helpful.
26. I feel that the presence of security, police and dumpsters is excessive and uncalled for.

I have had a phone but it has been stolen many times.

AFFIRMED BEFORE ME in the)
 City of Kitchener, this *15th* day of)
 October, 2025)
 In the Regional Municipality of Waterloo)

[Signature]

ASHLEY SCHUITEMA,
 a Commissioner, etc.,
 Province of Ontario,
 while a Barrister and Solicitor.
 LSO #68257G

[Signature]

I also rely on the outreach services from CMHA and SOS workers.

[Signature]

**THE REGIONAL MUNICIPALITY OF
WATERLOO**
Applicants

and

**PERSONS UNKNOWN AND TO BE
ASCERTAINED**
Respondents

Court File No.: CV-25-00000750-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

Proceeding commenced at KITCHENER

AFFIDAVIT OF XANDER HARKER

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Lawyers for the Respondents

TAB 6

Court File No. CV-25-00000750-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

THE REGIONAL MUNICIPALITY OF WATERLOO

Applicant

and

PERSONS UNKNOWN AND TO BE ASCERTAINED

Respondents

APPLICATION UNDER Rule 14.05 of the *Rules of Civil Procedure*

AFFIDAVIT OF CHARLES KOCHER

I, Charles Kocher, of the City of Kitchener, in the Province of Ontario, AFFIRM AND SAY:

1. I have personal knowledge with respect to the facts set out below, except where stated otherwise. Where the information is not based on my personal knowledge, it is based upon information provided by others which I believe to be credible and true.
2. I am a 41 year old male.
3. I have two children who were born in 2010 and 2012. My children live with my parents in Huron Park.
4. I am divorced. I am engaged and my partner currently lives in Durham, Ontario because there is no where in Kitchener that we can stay together.
5. My source of income was Ontario Works and I received benefits up until December 2025, but I was hospitalized at the time and my benefits have been put on hold.

6. I am non-status Mi'kmaq. I suffer from physical health conditions, as well as Anxiety, ADHD, Situational Depression and Addiction.
7. I was hospitalized for a number of weeks in December 2025. I had three heart attacks and I had a blood clot that went to my lung. I was also in a coma. I was discharged back into homelessness. I returned to the encampment at 100 Victoria and have been staying there ever since. I have a drainage tube from my gallbladder that I walk around with. I am supposed to return for medical care every couple of days to the ParaMed clinic on Greenbrook Drive to have it flushed and dressings changed, but I have no money to access transportation to return. I hope it does not get infected and plan to attend the medical centre across the street at the Soup Kitchen to have it looked at. They were closed today so I need to go to Ray of Hope.
8. In the past I used meth, weed and occasionally cocaine. For the past three years I have used fentanyl daily. I wasn't using when I was in the hospital, but I was receiving medical grade pain medication and I feel that I left the hospital more addicted then when I went in.
9. In 2023 I successfully used Sublocade injections to treat my addiction. I was sober five months at that time. I was also sober for 10 years after the birth of my son, but I had some issues with my parents and I relapsed.
10. I am one credit shy of my high school diploma. I have worked as a CNC Machinist and in small engine repair. The last time I worked was approximately two years ago.
11. I have been experiencing homelessness for the past 3-4 years. I have lived at the encampment, couch surfed and also been in jail. I was living at the encampment in the spring of 2025. I was

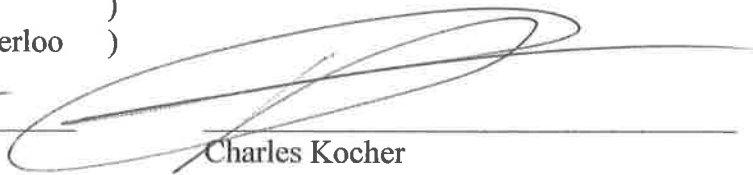
there in March 2025, but I went to jail at some point in April 2025. I do not know if I am considered a resident by the Region or if I was in jail when they did the counting.

12. I have lived at other encampments in the Region. I experienced three encampment evictions in Cambridge between 2023 - 2024. I was evicted from an encampment at 150 Main Street, Cambridge and also from Soper Park, Cambridge. I wasn't there for one of the evictions and all my stuff was thrown out. They treated it as junk and they tossed everything. I had a guitar that was thrown out and other sentimental stuff that can't be replaced. I felt lost when my stuff was thrown out. No one had a clue where we could go to survive.
13. I have also slept outdoors in grassy areas. I have been assaulted and robbed while living unsheltered. People would sneak up on me and steal my stuff. I have been turned away from shelters because they are full.
14. I stayed at the House of Friendship shelter in Waterloo for a few weeks. It was great, you only have two people to a room and if you are trying to stay away from drugs they will pair you with someone that also is not using. I missed check in for approximately 4-5 days because of legal issues and I lost my space. I wanted to get back in, but it is hard to get back in there.
15. I was staying at A Better Tent City as a visitor for a while. I went there when I was released from jail in and around the end of June 2025. A Better Tent City stopped allowing visitors in September / October 2025, and that put a lot of people out. I returned to 100 Vic at that time.
16. I have stayed in Bridges in Cambridge, but there are a lot of triggers there. There is a lot of drug supplies around and I don't like being around it. It is also not very clean.

17. I am open to getting a motel and would like to have one for my medical issues. I haven't been offered one and I am not sure how some people get offered them and others don't. I am not sure how I keep getting overlooked. I have talked to the Region workers, at least one time since returning in December 2025, and a few other conversations in the last year. I have only ever been offered emergency shelter.
18. I rely on food and clothing donations dropped off at the Encampment, and Sanguen health services. I use the Soup Kitchen for food, showers and laundry. I like being able to access the portable washrooms at the encampment.
19. The trouble I have in finding somewhere to live is that I don't have money for a deposit, many landlords look at you when you are homeless and make up their mind about you, my credit sucks and I don't have a co-signer for a lease. I have no access to transportation to view apartments and I haven't had a proper landlord in some time so I have no references. I think I am on the Region's wait list for affordable housing, but I'm not sure.
20. As a result of my medical issues, I am currently in a lot of pain in my abdomen. I would have trouble going to view apartments because of the pain. If I was moved somewhere far from services I would also have trouble accessing those services because of pain.
21. If the encampment was closed I am not sure what I would do. Lots of homeless people would be looking for places to live. I think there are around 30 people still living here. I see a lot of

faces, but I don't know exactly who is staying here. I do not feel that the safety at the encampment has declined. The rats are worse, but I do not feel there are more safety issues or more weapons than there were at other times I have stayed here.

AFFIRMED BEFORE ME in the)
City of Kitchener, this 13th day of)
January, 2026)
In the Regional Municipality of Waterloo)


Charles Kocher

ASHLEY SCHUITEMA,
a Commissioner, etc.,
Province of Ontario,
while a Barrister and Solicitor.
LSO #68257G

**THE REGIONAL MUNICIPALITY OF
WATERLOO**
Applicants

and

⁴³
**PERSONS UNKNOWN AND TO BE
ASCERTAINED**
Respondents

Court File No.: CV-25-00000750-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

Proceeding commenced at KITCHENER

AFFIDAVIT OF CHARLES KOCHER

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Lawyers for the Respondents

TAB 7

Court File No. CV-25-00000750-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

THE REGIONAL MUNICIPALITY OF WATERLOO

Applicant

and

PERSONS UNKNOWN AND TO BE ASCERTAINED

Respondents

APPLICATION UNDER Rule 14.05 of the *Rules of Civil Procedure*

AFFIDAVIT OF ALINE JEFFERY

I, Aline Jeffery, of the City of Kitchener, in the Province of Ontario, **AFFIRM AND SAY:**

1. I have personal knowledge with respect to the facts set out below, except where stated otherwise. Where the information is not based on my personal knowledge, it is based upon information provided by others which I believe to be credible and true.
2. I am a 46 year old female.
3. I am Métis.
4. I suffer from Lupus, Fibromyalgia, Post Traumatic Stress Disorder, Borderline Personality Disorder and addictions.

5. I have struggled with addiction all my life on and off because of trauma. Both as a child and throughout my previous marriage I experienced sexual, mental and emotional abuse. In March 2025, I was drugged and sexually assaulted in my home in Sudbury.
6. When I was 21 years old I was prescribed oxycontin and percocets for my Lupus and Fibromyalgia, and I became addicted. I have also struggled with alcoholism and used cocaine. I am not currently using any substances.
7. I rely on Canada Pension Plan Disability benefits for income. I receive around \$1470.00 per month.
8. I worked for thirteen years as a law clerk, and previous to that in a position as a medical assistant. I retired in 2019.
9. I have four children aged 33, 26, 23 and 16. Two live in Renfrew (aged 26 and 16), one lives in Sudbury (aged 23) and the other I don't know where he is (aged 33). I first became pregnant when I was fourteen years old. My children were not in my home when I experienced the sexual assault in Sudbury.
10. I am legally married to Michael Jeffery and we are residing at the encampment at 100 Victoria Street together. For 19 years we rented a home in Sudbury. However, in September of 2025, we decided we needed to leave Sudbury for our safety. We packed up all of our belongings into a U-Haul and lived out of the vehicle.

11. At the end of September 2025, we were stopped by the police because it was alleged that I had broken my contract with U-Haul by not returning the vehicle. The police took the U-Haul from us with some of our belongings.
12. After we lost the U-Haul, we slept in parks until we were asked to move by By-Law officers, we slept in abandoned warehouses, in the bush, and when we can afford it we have stayed in motels. Since coming to Waterloo Region we have had to move around at least ten times. Most of our belongings have been lost in the moves, including a bag which had a lifetime of memories inside it. Our first night in a tent in a park we were robbed.
13. We have stayed at the Weber Inn, Mayflower Motel, Fairway Inn, and Victoria Inn. After an incident at the Victoria Inn where I was being asked to pay on the spot for a room at a higher rate than before we were forced out of the motel by the police. Now we are banned from staying at the Weber Inn, Victoria Inn, and Sherwood Inn. We can only stay at the Fairway Inn.
14. After moving around from motels to parks to abandoned warehouses we came to the encampment at 100 Victoria Street about three weeks ago. Tyler from SOS gave us a tent. I like the community here. We are closer to services, like laundry, showers and food.
15. We started in a two person tent but then someone gave us a ten person tent. People help each other and take care of each other. I help receive the donations and thank people who drop them off. Everyone knows I will be fair in sharing.

16. I receive services from SOS, Sanguen, Ray of Hope and St. John's Kitchen. I used to have to travel to Weber Inn on Thursdays to access Sanguen services, but today the van came to the encampment and I was able to access services there.
17. Because of the food donations at 100 Vic I am eating. Before I came here I lost so much weight.
18. On Saturdays and Sundays when St. John's Kitchen is closed the only place to get warm are the warming centres. But those places are usually at capacity.
19. Shelters for me are out of the question. I won't separate from Mike, my husband. I was sexually assaulted in March of 2025 and now have PTSD. There are no shelters where I can stay with Mike as a couple.
20. On January 13, 2026, Starling referred me to an Unsheltered Support Worker with the Region. But because I don't have a birth certificate we can't get on any housing lists. I heard the lists are anywhere from 2 to 8 years. I also heard the motel program is ending soon.
21. Right now there are about twenty people residing at the encampment but up to fifty people stay and sleep by the fire or by the sandbag hut during the day. Since we arrived three weeks ago five more people have come, including more women.
22. If the encampment closed Mike and I would be back to square one, having to find abandoned places to sleep. After I arrived I heard about the by-law and went with another resident to city hall to speak about closing the encampment. But when I got to city hall I

was told that I had to be on a list to be able to speak. I didn't know I needed to sign up. I didn't know that there had been an information session at the library.

23. We have recently become aware of Regional outreach workers but we haven't connected with them yet. We could not afford a market unit and would need a subsidy. It would be hard for us to come up with first and last month's rent. Because of my trauma I would be very concerned about the location of what's being offered to us.
24. I don't think I would take storage if it was offered to me. I have already lost all my original belongings. I need housing, not storage. If I am made to leave I don't want to store my tent, I need my tent.
25. Forcing residents out of the encampment won't solve the problem. People living there will be forced to find somewhere else to set up tents. People will form a community elsewhere because they feel safer in a group regardless of their differences.

AFFIRMED BEFORE ME in the)
 City of Kitchener, this 21st day of)
 January 2026 in the)
 Regional Municipality of Waterloo)



ASHLEY SCHUITEMA,
 a Commissioner, etc.,
 Province of Ontario,
 while a Barrister and Solicitor.
 LSO #68257G



**THE REGIONAL MUNICIPALITY OF
WATERLOO**
Applicants

and

**PERSONS UNKNOWN AND TO BE
ASCERTAINED**
Respondents

Court File No.: CV-25-00000750-0000

50

**ONTARIO
SUPERIOR COURT OF JUSTICE**

Proceeding commenced at KITCHENER

AFFIDAVIT OF ALINE JEFFERY

WATERLOO REGION COMMUNITY LEGAL SERVICES
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Kitchener, Ontario N2H 2P5

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Shannon K. Down (LSO# 43894D)
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Lawyers for the Respondents

TAB 8

Court File No. CV-25-00000750-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

THE REGIONAL MUNICIPALITY OF WATERLOO

Applicant

and

PERSONS UNKNOWN AND TO BE ASCERTAINED

Respondents

APPLICATION UNDER Rule 14.05 of the *Rules of Civil Procedure*

AFFIDAVIT OF MICHAEL JEFFERY

I, Michael Jeffery, of the City of Kitchener, in the Province of Ontario, AFFIRM AND SAY:

1. I have personal knowledge with respect to the facts set out below, except where stated otherwise. Where the information is not based on my personal knowledge, it is based upon information provided by others which I believe to be credible and true.
2. I am a 48 year old male.
3. I am certified in welding from Cambrian College. Throughout my career I worked as a jack of all trades, doing welding, maintenance, and supervising, among other roles.

4. In October 2024 I was injured at work. My finger was crushed in the accident. I applied for WSIB and received benefits for 5 weeks and then was on EI sick benefits until April or May of 2025.
5. Since late October, I have been receiving Ontario Works (OW). My OW has changed since I've been homeless and I expect to only receive around \$305 to cover basic needs. I am in the process of applying for the Ontario Disability Support Program (ODSP) for my mental health disability.
6. I have four grown children. Two live in Renfrew, one lives in Sudbury, and I don't know where the other one is.
7. I have Bipolar Disorder and Schizoaffective Disorder. I take monthly injections for Schizoaffective Disorder, called Invega.
8. I am legally married to Aline Angele Marie Jeffery.
9. Aline and I have been homeless since September, when we fled Sudbury for our safety. We rented a home in Sudbury for 19 years. When we left we packed up all our belongings into a U-Haul van and sheltered in that van. At the end of September, police found us at a parking lot in Kitchener and took the van from us. We lost most of our belongings.

10. Since we lost the U-Haul van, Aline and I have been cycling between finding motel rooms when we have some spare cash and finding spots to set up a tent when we don't. We have slept in an abandoned warehouse, in the bush, and in parks.
11. We have had to move at least ten times since the end of September and were robbed of the few belongings we had left one night when we were staying in a park. When we were told to leave a different park we were so depressed.
12. We have stayed at the Weber Inn, Victoria Motel, Fairway Inn, and Mayflower Motel before. One night that we were staying at the Victoria Inn there was an incident where the staff came to our room and tried to increase our nightly rate from \$90 to \$140. We refused to pay a higher rate and the staff had police remove us from the motel. We have been blacklisted from the owners of the Victoria, Sherwood, and Weber Inns because of that incident.
13. We cannot stay in a shelter because we need to stay together and there are no shelter options for couples.
14. We spent our last bit of money at Mayflower Inn and came to the encampment at 100 Victoria Street about three weeks ago because we have nowhere else to go. Tyler from SOS gave us a two person tent that we slept in for six days, then a volunteer gave us a ten person tent. We can leave our tent alone because there is a community here keeping an eye out.

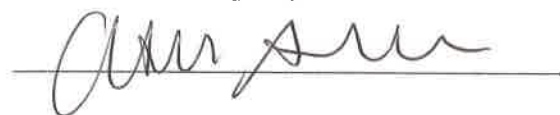
15. We are close to services now, like laundry, showers, and food. People also donate food and supplies.
16. There are people from all walks of life trying to survive here, but people here are taking care of each other and helping each other. It is the difference from being in a casket to managing. People here are smart about what's going on and have given us good advice like telling us to lay down a skid and double up on tents. I try to do my part by maintaining the encampment site. I pick up garbage and organize and sort out the donations, I try to keep the fire going and welcome new people to the site.
17. I was told recently that the by-law was changing and it was posted on the building. I know what they intend to do with the property but don't know what they are going to do to get us out of here. I think it will only be like 24-48 hours notice and then it will be enforced like what happens in Sudbury.
18. The people who stay here are regular people like Aline and I, people who may have made some bad decisions or experienced bad luck. This city is jammed and there are no other parks available. If this place didn't exist there would be over 60 people who were not clothed, sheltered, bathed, or fed, on top of those who are on the street. If this encampment is closed it will cause further crime because people will break into places looking for refuge. Also the volunteers wouldn't know where to find us or where to bring helpful, life saving donations.

19. If we were offered storage I think it could be useful. I could put a bike in storage. But I would take a tent over storage.

20. Now that we found this place, we feel ok and can start looking for other things like jobs and housing. I have accessed services here like SOS, First Connect, and the Working Centre. Staff at the Working Centre are helping us to file paperwork with the Region so we can get on the housing waitlist.

AFFIRMED BEFORE ME in the)

City of Kitchener, this 21 day of)
January, 2026 in the)
Regional Municipality of Waterloo)



ASHLEY SCHUITEMA,
a Commissioner, etc.,
Province of Ontario,
while a Barrister and Solicitor.
LSO #68257G

**THE REGIONAL MUNICIPALITY OF
WATERLOO**
Applicants

and

⁵⁷
**PERSONS UNKNOWN AND TO BE
ASCERTAINED**
Respondents

Court File No.: CV-25-00000750-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

Proceeding commenced at KITCHENER

AFFIDAVIT OF MICHAEL JEFFERY

WATERLOO REGION COMMUNITY LEGAL SERVICES
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Lawyers for the Respondents

TAB 9

Court File No. CV-25-00000750-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

THE REGIONAL MUNICIPALITY OF WATERLOO

Applicant

and

PERSONS UNKNOWN AND TO BE ASCERTAINED

Respondents

APPLICATION UNDER Rule 14.05 of the *Rules of Civil Procedure*

AFFIDAVIT OF JULIE KALBFLEISCH

I, Julie Kalbfleisch, of the City of Waterloo, in the Province of Ontario, AFFIRM AND SAY:

1. I have personal knowledge with respect to the facts set out below, except where stated otherwise. Where the information is not based on my personal knowledge, it is based upon information provided by others which I believe to be credible and true.
2. I am the Director, Public Engagement of Sanguen Health Centre, a Health Agency in Waterloo Region.
3. Sanguen Health Centre provides harm reduction and outreach services to deliver low-barrier, life-saving support directly to people who use drugs and people experiencing homelessness. Sanguen Health Centre operates mobile outreach and street-based services that provide harm reduction supplies, primary health care, overdose response education, safer use information, and referrals to health and social supports. Our teams work in encampments, shelters, supportive housing, and public spaces, building trust through consistent presence and non-judgmental care. Sanguen reduces risk, responds quickly to emerging needs, and connects individuals to ongoing care when and how they are ready. Our

Community Health Van visits the encampment at 100 Victoria Street, Kitchener weekly to provide these services, among other things.

4. On November 28, 2025, I was informed by a Sanguen employee, Michelle Steingart, that Sanguen received a phone call on the general phone line from someone at Waterloo Region Housing Services to advise that weapons were identified among the community at 100 Vic., but that there were no incidents to report. Following receipt of this phone call, Michelle Steingart sent an email out to all staff at Sanguen.
5. Staff at Sanguen were not able to independently verify these concerns and decided it was best to temporarily pause services at 100 Vic until the Manager of Harm Reduction could assess the level of risk.
6. Following an assessment by the Manager of Harm Reduction and consultation with staff, services were able to be safely resume at the 100 Victoria Encampment the week of January 19, 2026.
7. I make this Affidavit for no improper purpose.

SWORN remotely by Julie Kalbfleisch at)
 the City of Hamilton, in the Province of ON,)
 before me at the City of Kitchener in the)
 Province of Ontario on February 12, 2026)
 in accordance with O. Reg. 431/20.)



ASHLEY SCHUITEMA
 A Commissioner of Oaths
 (LSO#: 68257G)



JULIE KALBFLEISCH

**THE REGIONAL MUNICIPALITY OF
WATERLOO**
Applicants

and

**PERSONS UNKNOWN AND TO BE
ASCERTAINED**
Respondents

Court File No.: CV-25-00000750-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

Proceeding commenced at KITCHENER

AFFIDAVIT OF JULIE KALBFLEISCH

WATERLOO REGION COMMUNITY LEGAL SERVICES
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Shannon K. Down (LSO# 43894D)
shannonkdown@gmail.com

Lawyers for the Respondents

TAB 10

Court File No. CV-25-00000750-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

THE REGIONAL MUNICIPALITY OF WATERLOO

Applicant

and

PERSONS UNKNOWN AND TO BE ASCERTAINED

Respondents

APPLICATION UNDER Rule 14.05 of the *Rules of Civil Procedure*

AFFIDAVIT OF CARINE LEE NIND

I, Carine Lee Nind, of the City of Kitchener, in the Province of Ontario, AFFIRM AND SAY:

1. I have personal knowledge with respect to the facts set out below, except where stated otherwise. Where the information is not based on my personal knowledge, it is based upon information provided by others which I believe to be credible and true.
2. I am a Community Development Consultant with Willowside Housing Co-operative Inc. in Waterloo Region, and an educator with Central Ontario Co-op Housing Federation (COCHF), serving Waterloo Region, Brantford and Guelph.
3. From 2002 to 2023, I was the General Manager of Willowside Housing Co-operative Inc. ("Willowside"). My duties included overseeing the day-to-day operations and ensuring the co-op was in compliance with relevant legislation and policies. I managed vacancies by accessing

and coordinating placements through the centralized housing wait list, as well as supervised staff, handled budgets, and supported the board in strategic decisions.

4. I am the recipient of two Region of Waterloo National Housing Day Awards, including the Lynn Macaulay Award for Outstanding Housing Educator (2022), and the Christine Wilson Award for Outstanding Housing Community Worker (2019).
5. I am extremely familiar with the co-operative housing system in Waterloo Region and the complexities of accessing a co-op unit through the centralized housing wait list facilitated by the Region.
6. There are very few, if any, vacancies in the co-operative housing system in Waterloo Region and it is unlikely that a resident living at the encampment located at 100 Victoria Street in Kitchener (“the encampment”) would be able to access a co-operative housing unit through the centralized housing wait list.
7. Willowside is one of twelve housing co-operative properties in Waterloo Region that has Rent Geared-to-Income (“RGI”) units that people can access through the Region’s centralized wait list. Willowside has 91 units in total in two apartment buildings in Kitchener. Currently about 65 units are RGI, 26 units are at full market value. Only six units are wheelchair accessible. There are only three 1-bedroom units that are accessible.
8. The Region’s policy is that a single person, or a couple, must be housed in a one-bedroom unit, they cannot be housed in a two-bedroom unit or larger. So if any two-bedroom or larger units

were to become available across the co-op housing system, a single person or a couple living at the encampment would not be eligible for these units.

9. For at least the past five years the only time a vacancy has become available at Willowside is when a co-op member dies. On occasion, throughout the past 15 years, someone may move out, but that is extremely rare. Only one 1-bedroom unit became vacant and available in all of 2025. This would be similar across all the co-ops in Waterloo Region.
10. Additionally, when a unit becomes vacant it must be offered to a current co-op member that is over housed. For example, if a mom and her adult child live together in a 2-bedroom unit and the child moves out, the mom is considered over housed and would need to move to a 1-bedroom unit should one become available. Current co-op members that are over housed would have first access to any vacant units that become available.
11. My understanding is that the centralized housing wait list through the Region is 10 years long, although I would suspect it is probably longer than that. The Region has a Special Priority Program (“SPP”) offered that will move people quicker along the wait list. The SPP includes victims of domestic violence, human trafficking, or terminal illness.
12. Willowside has its own community rules and policies, like all co-operative housing. When a unit would become available the community rules would be explained to whoever the candidate was on the centralized housing wait list and they would have to agree to abide by the rules and engage with the community.
13. To even be placed on the centralized housing wait list, the candidate would have to have income of some sort, either social assistance or otherwise. They would also need to have a

14. A significant issue I encountered over the years is that the supports in place to get someone housed end as soon as the person is housed. There are no follow up supports provided to make sure the candidate remains successfully housed. Willowside would do whatever it could to accommodate people and try to keep them housed, but people off the SPP would come with trauma and mental health challenges and were given no follow up supports.

AFFIRMED BEFORE ME in the)
City of Kitchener, this 20th day of)
February, 2026)
In the Regional Municipality of Waterloo)


CARINE LEE NIND

B-1-10560

**THE REGIONAL MUNICIPALITY OF
WATERLOO**
Applicants

and

**PERSONS UNKNOWN AND TO BE
ASCERTAINED**
Respondents

Court File No.: CV-25-00000750-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

Proceeding commenced at KITCHENER

AFFIDAVIT OF CARINE LEE NIND

WATERLOO REGION COMMUNITY LEGAL SERVICES
450 Frederick Street, Unit 101
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Lawyers for the Respondents

TAB 11

Court File No. CV-25-00000750-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

THE REGIONAL MUNICIPALITY OF WATERLOO

Applicant

and

PERSONS UNKNOWN AND TO BE ASCERTAINED

Respondents

APPLICATION UNDER Rule 14.05 of the *Rules of Civil Procedure*

3rd AFFIDAVIT OF SARA ESCOBAR

I, Sara Escobar, of the City of Kitchener, in the Province of Ontario, AFFIRM AND SAY:

1. I have personal knowledge with respect to the facts set out below, except where stated otherwise. Where the information is not based on my personal knowledge, it is based upon information provided by others which I believe to be credible and true.
2. I previously affirmed affidavits dated June 23, 2025 and July 7, 2025. I adopt and rely upon those Affidavits and update certain matters below.
3. I am extremely familiar with the issue of homelessness and the shelter system in Waterloo Region and the complexities of serving the street involved population. I am currently employed as a community development worker at a local shelter. I sit as one of ten members of the Plan to End Chronic Homelessness Coordinating Committee that serves as a leadership committee for the Co-Creators.

TRANSITION PROTOCOL

4. I have reviewed By-Law Number 26-001 that amends the Site Specific By-Law, including Schedule “C”, the Transition Protocol. The Transition Protocol indicates the Region will “Offer a Resident Alternative Accommodation” and it goes on to list various forms of Alternative Accommodation. I will comment below about those various forms of Alternative Accommodation and the many barriers I have observed in assisting people who are trying to navigate the housing system in Waterloo Region.
5. In my experience a person may have an Individual Housing Plan developed and still not be able to access the various forms of Alternative Accommodation listed in the Transition Protocol. No matter how hard a support worker may work, there are various factors that tend to impede this process, including personal complexities, the rising cost of market rent, discriminatory beliefs held by landlords, and/or health concerns or complications.
6. Despite my 30 years of experience working within the housing stability system, I still find the system of affordable housing and rental subsidies chaotic and difficult to navigate. There are often many changing programs and shifting eligibility criteria, and it is hard to follow. There are various types of applications and different funding sources, these apply differently to people depending on their age, what they are earning and the length of time they have been experiencing homelessness. We look at how many different potential buckets of funding someone may fall under and apply to as many places as possible to assist someone staying at our shelter. Even with a support worker this process is difficult to navigate and often does not result in any housing option being made available.

EMERGENCY SHELTER

7. The Region has **351** beds in the emergency shelter system, across eight adult shelters. Attached hereto as “**Exhibit A**” is the most recent data that was shared with the PECH Co-Creators on February 17, 2026. This data is collected through Homeless Individuals and Families Information System (“HIFIS”) and analyzed by FirstConnect, Argus Residence, the Region funded community partner that operates a 24/7 support phone line that connects people experiencing homelessness with the emergency shelter system.
8. I have access to HIFIS and believe this data is accurate as presented. According to this data on February 13, 2026 there were **8** spaces available for adult men, **0** spaces available for adult women or gender diverse people, **11** spaces available for youth aged 16-25, and **0** spaces available for adults that are medically complex.
9. FirstConnect has also provided an explanation for how to understand the occupancy rates, which I believe to be an accurate explanation. For example, despite Erbs Road Cabins showing an occupancy rate of 96% the FirstConnect data notes: “Erb’s Road Cabins shelter program operates differently from adult emergency shelters in Waterloo Region. This means that, even if the system is showing a bed available, there is not actually one where someone can be referred to and access right away. The referral process is done differently and in collaboration with regional Unsheltered Outreach Workers and The Working Centre Outreach Workers to determine need and fit.”
10. The majority of the available emergency shelter spaces on February 13, 2026 are in Cambridge at the Cambridge Shelter for men. In my experience, many people experiencing homelessness in Kitchener do not want to leave their support system and go to Cambridge every night in the

hopes of accessing a bed. Also some people have service restrictions from shelters and may not be welcomed there. The Region does not have uniform expectations for emergency shelters and so each agency set their own guidelines for service restrictions. This can add to the confusion and frustration experienced by system users.

TRANSITIONAL HOUSING

11. There are a total of 175 Transitional Housing spaces in the Region¹:

- SHIP University Avenue: 80 spaces (men, women, gender diverse)
- SHIP 84 Frederick Street: 40 spaces (women and gender diverse)
- Safe Haven: 6 spaces (16-18 years old)
- Marillac Place: 21 spaces (pregnant women and women with children under 2 years old)
- Coalition for Muslim Women Dar-al Aman: 28 spaces (racialized women)

12. It is unlikely that there are vacancies in these transitional spaces. There are also some issues with how vacancies are documented. For example, recently there were 15 vacancies showing at SHIP University Avenue, however these were units that were under renovation and were not truly vacant. Additionally, in order to gain access to a transitional housing space, a person would need to be interviewed and approved by the service provider.

¹ <https://www.regionofwaterloo.ca/en/living-here/emergency-shelters-and-transitional-housing.aspx#Service-Housing-In-the-Province-SHIP-University-Avenue>

AFFORDABLE HOUSING / SUPPORTIVE HOUSING

13. The Region runs a Centralized Wait List for Rent Geared-to-Income subsidized rental housing units and co-operatives, through the Community Housing Access Centre (“CHAC”).
14. According to the Region’s website there are 5,600 affordable housing units, however the Region’s website also states: “The number of people in need of subsidized housing exceeds the number of units available, meaning that wait times for an applicant to receive housing are significant.”² It is my understanding that the general wait list is 8-10 years long. Please do not have access to the wait list. In my experience supporting women at the shelter, I am aware that the wait list for older adults is 3-7 years long.
15. There are different Priority Statuses which will move someone up the list, these currently include: Victims of domestic violence, Victims of human trafficking, Terminally ill, Overhoused, Sunnyside, and Local Statuses (Homelessness, Escaping violence, Separated Families). Despite falling into one of the priority status categories, it doesn’t mean someone will get housing right away because of the volume of people with priority status already waiting for housing. For example, for someone that is experiencing an immediate situation of domestic violence, one of the top priority statuses, the wait time for a unit is 13 months.
16. In my experience in the past year at the women’s shelter, we were only able to successful move **one** senior woman into long term care. This was someone presenting with many needs and complexities. That process took over six months of multiple agencies working together to

² <https://www.regionofwaterloo.ca/en/living-here/find-affordable-housing.aspx>

advocate for this woman, who was extremely vulnerable living in an emergency shelter. There is only one affordable building for older adults in the entire Region.

17. Although the Region's Transition Protocol identifies different types of housing under the Affordable Housing category, including non-profit housing, co-op housing, and Waterloo Region Housing, all those types of housing would be accessed through the CHAC or "the list". This means any new additions would be added to the queue, as long as they are eligible to be added to the list.
18. Some common barriers to getting on the list include people with precarious immigration status who are not eligible, people that owe rent arrears or damages to a housing provider and do not have an approved re-payment agreement in place are not eligible, and people that do not keep their application up to date, may have their files cancelled and be removed from the list.³
19. People who experience chronic homelessness are likely to be removed or dropped off the list as it is required to be updated once a year with proof of income or proof of lack of address. This is challenging for people experiencing chronic homelessness, especially when they face encampment displacements or evictions from other interim housing to can contribute to loss of ID or other paperwork they may need.

RENTAL SUPPLEMENT PROGRAM

20. Starling Housing Services, a partner agency of the Region, runs a rental supplement program in the Region. They run a PATHS2HOME program and a rapid housing program that partners

³ <https://www.regionofwaterloo.ca/en/living-here/find-affordable-housing.aspx#2-How-do-I-keep-my-application-active>

chronically homeless individuals with private landlords, and people are prioritized according to the results of their needs assessment. This program is outside of the CHAC process and Starling, a community organization, has complete discretion over who can access their rental supplements and how the list is managed.

21. A person receiving Ontario Works (“OW”) or Ontario Disability Support Program (“ODSP”) still may not be able to afford a market rental unit, even with a rental supplement. For example, we have access to a rental supplement for women staying at our shelter for up to \$850 per month. With a shelter allowance through OW, this would give someone approximately \$1,300 to pay rent monthly, which is far below average market rents. There have been no suitable or appropriate units found within the price range that she can afford, and then there would be the additional hurdle of potential discriminatory attitudes from Landlords that we have encountered in the past.
22. I have experienced a situation where I was supporting someone with a rent subsidy to view an apartment and the landlord said “I did not know that is who you were bringing to view the apartment, I am not renting to *her*.” Another person, whom we have supported in the last year, has been to 27 different housing viewings and has been unsuccessful in securing a lease. This can be morally debilitating and traumatizing.

SUPPORTIVE HOUSING

23. My understanding is that there is a very long wait for supportive housing units. There are limited units and people have to interview for them and will be placed at the agency’s discretion. There are only a few situations when a unit becomes available, someone may become service restricted, they may die or they may transition to a seniors home or market

unit. In my last nearly one year of working at a women's shelter, one of the things that have become clear is that trying to support people into long term housing is difficult. We have successfully moved one person into supportive housing. This was someone with very high needs that was being supported through the Developmental Services of Ontario and it took approximately six months before we were able to support this person into housing.

SUPPORTS FOR NON-RESIDENTS

24. I understand that for non "Residents" living at 100 Victoria, as defined by the By-law, the Region will offer to bring that person "into the Region's housing stability system and endeavour to provide the person with appropriate housing options, subject to resources being available". This is a very meaningless offer because it is likely that many of the non-Residents living at the Encampment are already in the housing stability system.
25. I have access to the Homeless Individuals and Families Information System ("HIFIS"), which is the case-management and data collection system for homelessness services. In the Region, this system is used by emergency shelters, transitional housing programs, outreach teams and other housing sector service providers. I would guess that being brought into the "housing stability system" would likely include being added to HIFIS. This likely means connecting people with agencies and support workers that they are likely already connected to.
26. The process engaged by the Region to clear the Encampment is deeply frustrating because any equity designed around the waiting lists completely disappears. At the women's shelter where I work, 40-60% of the women staying at the shelter are over the age of 55, they are waiting for a space and will be bumped down the list while people at the Encampment are prioritized.

Although the women we support are indoors, they are still staying in a communal emergency shelter and are all waiting for a space of their own.

27. The Transition Protocol states that they will offer social service supports, in the same nature as provided at the Encampment, to a Resident once moved to Alternative Accommodation. My understanding of the role of the unsheltered workers is that they support people that are unsheltered, and once someone comes indoors the supports stop.
28. The offer of storage for up to six months' of any additional personal belongings that cannot be taken to the Alternative Accommodation is difficult because people may be at their temporary accommodation for longer than six months. 208 days is the average length of stay in the Region's emergency shelter system, according to the Region's data. Attached hereto as **"Exhibit B"** is the slide deck that was shared with the PECH Co-Creators on November 25, 2025.

CONCERNS AT ENCAMPMENT

29. Not to diminish the violence that may be occurring, but violence, harassment and threats of violence are not unique to the Encampment. In my experience people living in survival mode in a congregate space (whether it be in a shelter or an encampment) will experience interpersonal conflicts that can lead to verbal and physical altercations. People with mental health conditions, staying in close contact with each other are bound to engage in escalated behaviours. At the shelter where I work violent or hostile incidents can lead to service restrictions as a last resort, this would be similar for other service providers in the Region. This is due to the inadequacy of placements for people due to limited spaces and resources available.

30. Neither the Plan to End Chronic Homelessness Co-Creators group, nor the Coordinating Committee that leads the Co-Creators group, were notified about any escalating or increasing violence at the Encampment, or about services being reduced or withdrawn.

SPECIAL COUNCIL MEETING

31. I listened and followed the special council meeting on Friday, January 9, 2026 where the motion was passed by council to approve the Bylaw amendments. Additionally, I listened to the debate that same day on the additional motion brought by Councillor Pam Wolf, directing staff to investigate a safe tenting protocol that ended in a tied vote, and was ultimately defeated. I was disappointed that council was not willing to direct staff to consider and report back on a safe tenting protocol for the Region.

32. I make this Affidavit in support of the Persons Unknown Application, and for no improper purpose.

SWORN remotely by Sara Escobar at)
the City of Kitchener, in the Province of ON,))
before me at the City of Kitchener in the)
Province of Ontario on February 20, 2026)
in accordance with O. Reg. 431/20.)



ASHLEY SCHUITEMA
A Commissioner of Oaths
(LSO#: 68257G)

Sara M Escobar

SARA ESCOBAR

THIS IS **EXHIBIT "A"** REFERRED TO
IN THE 3rd AFFIDAVIT OF SARA ESCOBAR
SWORN REMOTELY AT THE
CITY OF KITCHENER BEFORE ME AT THE REGION OF WATERLOO
DURING A ZOOM VIDEOCONFERENCE
IN ACCORDANCE WITH O.REG. 431/20,
ADMINISTERING OATH OR DECLARATION REMOTELY
THIS 20TH DAY OF FEBRUARY, 2026



ASHLEY SCHUITEMA
A Commissioner, etc.,
Province of Ontario,
While a Barrister and Solicitor.
LSO # 68257G

Homelessness Chronicity in Emergency Shelters

A look at our emergency shelter system over the past five months.

This data is collected from HIFIS and analyzed by FirstConnect, Argus Residence.

Demographics in Adult Shelters

How many beds are available in our shelter system?

There are currently 351 beds in our emergency shelter system, across eight adult shelters. Here's a breakdown:

Cambridge Shelter has 80 beds.

SHIP 84 Frederick St has 22 beds.

SHIP Edith Mac has 37 beds.

YW Cambridge has 20 beds.

HoF ShelterCare has 98 beds.

OneROOF has 24 beds.

BridgeCare has 20 beds.

Erb's Road Cabins has 50 units.

Breakdown of bed availability by shelter

	Total occupied beds/ total beds available; Oct. 14	Total occupied beds/ total beds available; Nov. 18	Total occupied beds/ total beds available; Dec 18	Total occupied beds/ total beds available; Jan. 14 2026	Total occupied beds/ total beds available; Feb 13
Cambridge Shelter	95%	100%	68%	95%	90%
HoF ShelterCare	101%	102%	93%	100%	100%
SHIP- Edith M.	95%	100%	100%	100%	100%
SHIP- 84 Frederick St	85%	91%	77%	109%*	123%*
YW Cambridge	95%	95%	115%	125%*	125%*
OneROOF	88%	75%	75%	96%	54%
BridgeCare	86%	71%	100%	40%	45%**
Erb's Road	98%	98%	96%	90%	96%***
Total % of occupied beds in ES system	95%	95%	92%	96%	94%

*SHIP 84 Frederick Street and YW Cambridge have increased their bed availability to accommodate more women and gender diverse individuals in the Winter months.

**BridgeCare is not currently accepting new intakes, therefore, it appears that there are beds available, when there aren't.

***Erb's Road Cabins shelter program operates differently from adult emergency shelters in Waterloo Region. This means that, even if the system is showing a bed available, there is not actually one where someone can be referred to and access right away. The referral process is done differently and in collaboration with regional Unsheltered Outreach Workers and The Working Centre Outreach Workers to determine need and fit.

A closer look, based on demographic: February 13

Cismen, transmen, 25/26+: **8 beds available**
 Ciswomen, transwomen, and gender diverse
 individuals, 25/26+: **0 beds available**

All genders, 16-25: **11 beds available**
 All genders, 18+, medically complex: **0 beds available** (no intakes at this time)

Chronic Homelessness in Emergency Shelters

The chart below compares the total chronic homeless population in each shelter to their bed occupancy.

	July 22	Aug. 20	Sept. 17	Oct. 14	Nov. 18	Dec. 18	Jan. 14, 2026	Feb. 13
Cambridge Shelter	60%	50%	59%	46%	59%	68%	67%	81%
ShelterCare	88%	89%	85%	80%	88%	93%	93%	95%
SHIP- Edith Mac	58%	76%	68%	60%	57%	57%	76%	81%
SHIP- 84 Frederick	68%	74%	73%	63%	74%	78%	88%	74%
YW Cambridge	63%	80%	85%	63%	79%	65%	60%	72%
OneROOF	50%	29%	38%	38%	44%	57%	39%	55%
BridgeCare	86%	79%	77%	75%	70%	71%	88%	89%
Erb's Road	96%	96%	96%	96%	96%	96%	98%	96%
Total % of Chronicity in ES syst.	74%	67%	74%	67%	74%	77%	79%	85%

Age Breakdown

	18-24	25-29	30-39	40-49	50-59	60-64	65+
Total	11	20	80	88	69	37	22
% of ES sys.	3%	6%	24%	27%	21%	11%	7%

Gender Breakdown

	Men	Women	Transgender or identity not spec.
Total	246	76	5
% of ES sys.	75%	23%	1%

Citizenship Breakdown

	Citizen	Permanent Resident	Established Immigrant	Recent Refugee	Refugee Claimant	Work/Student Visa
Total	305	5	9	4	4	3
% of ES sys.	93%	1%	3%	1%	1%	1%

THIS IS **EXHIBIT "B"** REFERRED TO
IN THE 3rd AFFIDAVIT OF SARA ESCOBAR
SWORN REMOTELY AT THE
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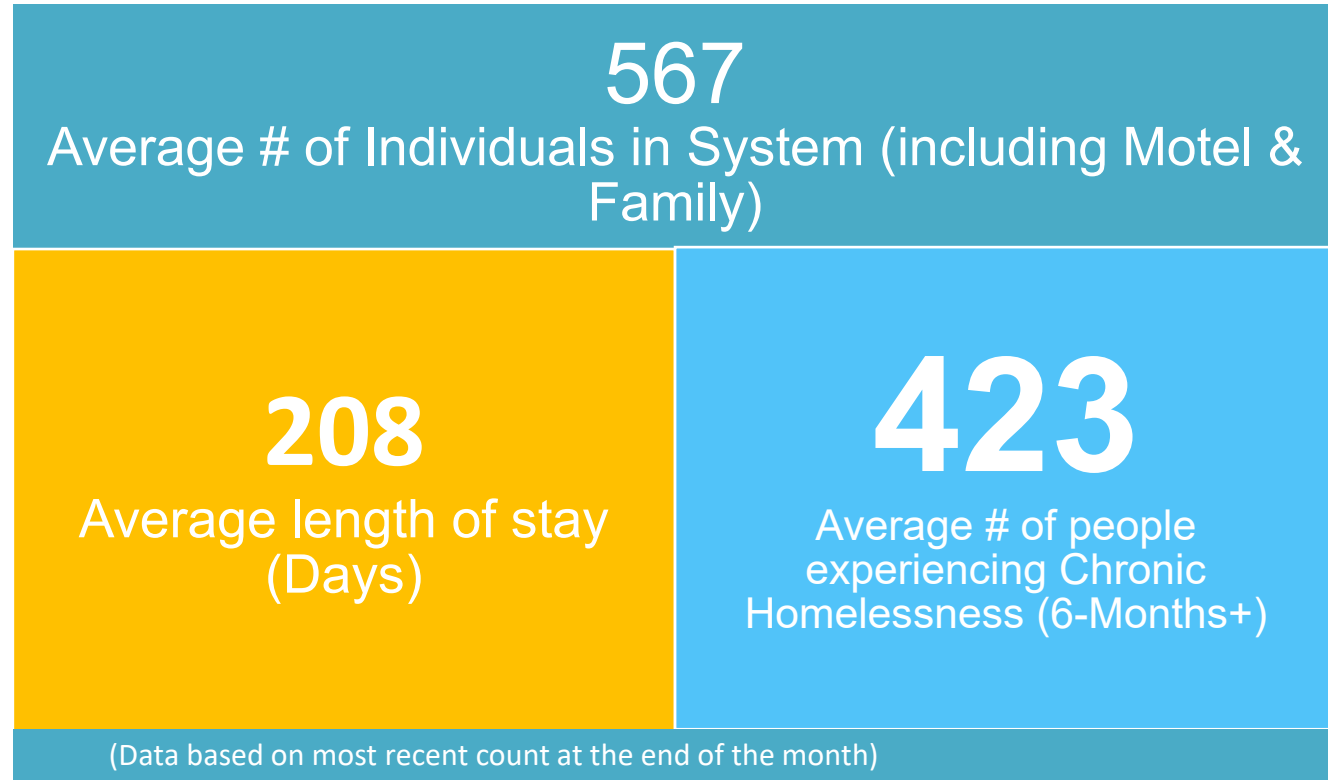


ASHLEY SCHUITEMA
A Commissioner, etc.,
Province of Ontario,
While a Barrister and Solicitor.
LSO # 68257G



Region of Waterloo

November 2025 HSS Data Update



94% Average Occupancy

34 Average Daily # Beds Available

** Please note that **the Average Occupancy %** and **the Average Daily # Beds Available** are calculated based on the system's average occupancy, **excluding Motel and Family programs**, as these do not have clearly defined capacity limits.*

Beds Availability - By Provider

85

B-1-10579

Provider	Average Daily # Beds Available	Average Occupancy %
CSC	5	93.35%
Erb's Rd	1	98.65%
Kinsmen	5	66.53%
oneRoof	4	83.60%
SafeHaven 2.0	5	50.00%
ShelterCare	2	98.39%
SHIP 84 Frederick	6	87.44%
SHIP Edith MacIntosh	-7	124.09%
YWCA Cambridge	0	99.03%
Life Launch	2	66.67%
Marillac Place	2	82.00%
UA	9	89.27%

B-1-10579

System Details - By Program Type⁸⁶

	Average # of Individuals	Average Daily # Beds Available	Average Occupancy %
Emergency Shelter	356	21	94.5%
Transitional Housing	83	13	87%
Motel	81	/	/
Family	59	/	/

** Please note that the Motel and Family programs do not report an average daily number of beds available or occupancy rate, since these programs do not operate with fixed capacity limits.*

System Details – By Location

	Cambridge	Kitchener					Waterloo		
	Total / ES	Total	ES	Motel	Family	TH	Total	ES	TH
Average # of Individuals in System (Occupancy)	105	255	103	81	59	12	219	148	71
Average Daily # Beds Available	11	12	8	\	\	4	11	2	9
Average Occupancy %	91%	91%	93%	\	\	73%	95%	99%	89%

**Program types are shown by location, and only those available at each location are displayed.*

**Motel and Family programs don't have fixed capacity limits, so only their average occupancy is included for fair comparison.*

Summary of Top 5 Book out reasons (212)

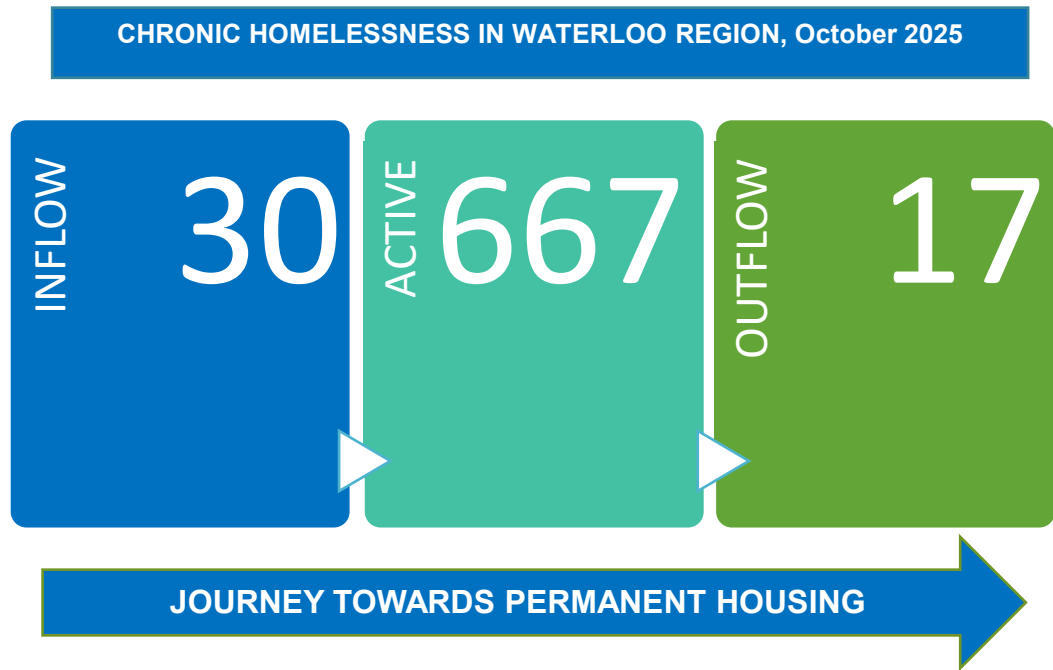
- Chose to stay somewhere else (63)
- Missed Nights (36)
- Whereabouts unknown (26)
- Service Restriction (18)
- Housed (16)

Emergency Shelter Service Restrictions

- 45 issued in the month of October across 8 shelters
- Median length of restriction: 4 days
- Top 3 reasons
 - Violence
 - Harassment, bullying, threats
 - Non-compliance with rules/regulations

Reasons for 26 Unique Turnaways (plus 10 anonymous callers) October 2025

Reason
No men's beds at time of call (18)
No women's beds at time of call (1)
Restricted from 1 Emergency Shelter (23)
Restricted from 2 Emergency Shelters (15)
No pet friendly shelter (2)
Total = 59 turnaways



Inflow

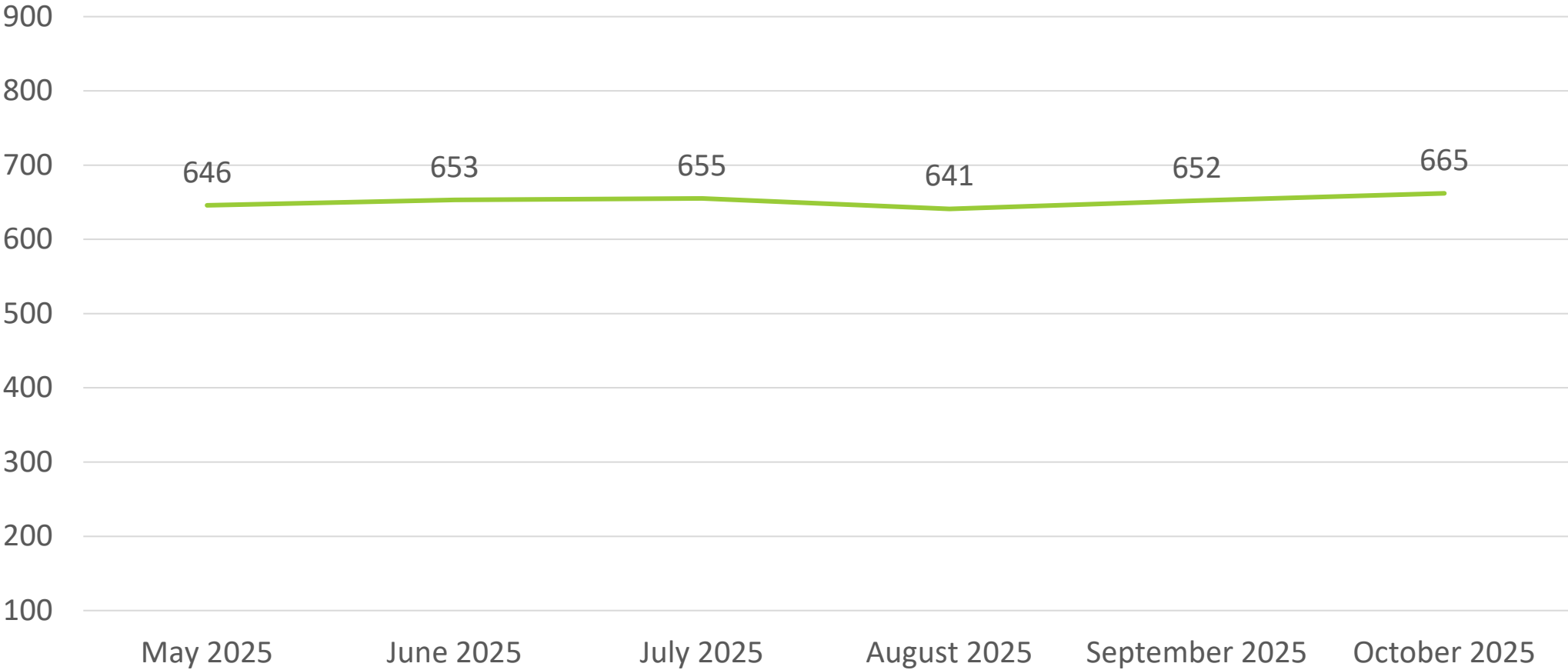
- Aged-in: **30**
- Returned from Inactive: 0
- Returned from Housing: 0

Outflow

- Housing: 15
- Inactive (No Contact/Moved): 1
- Inactive (Deceased): 1

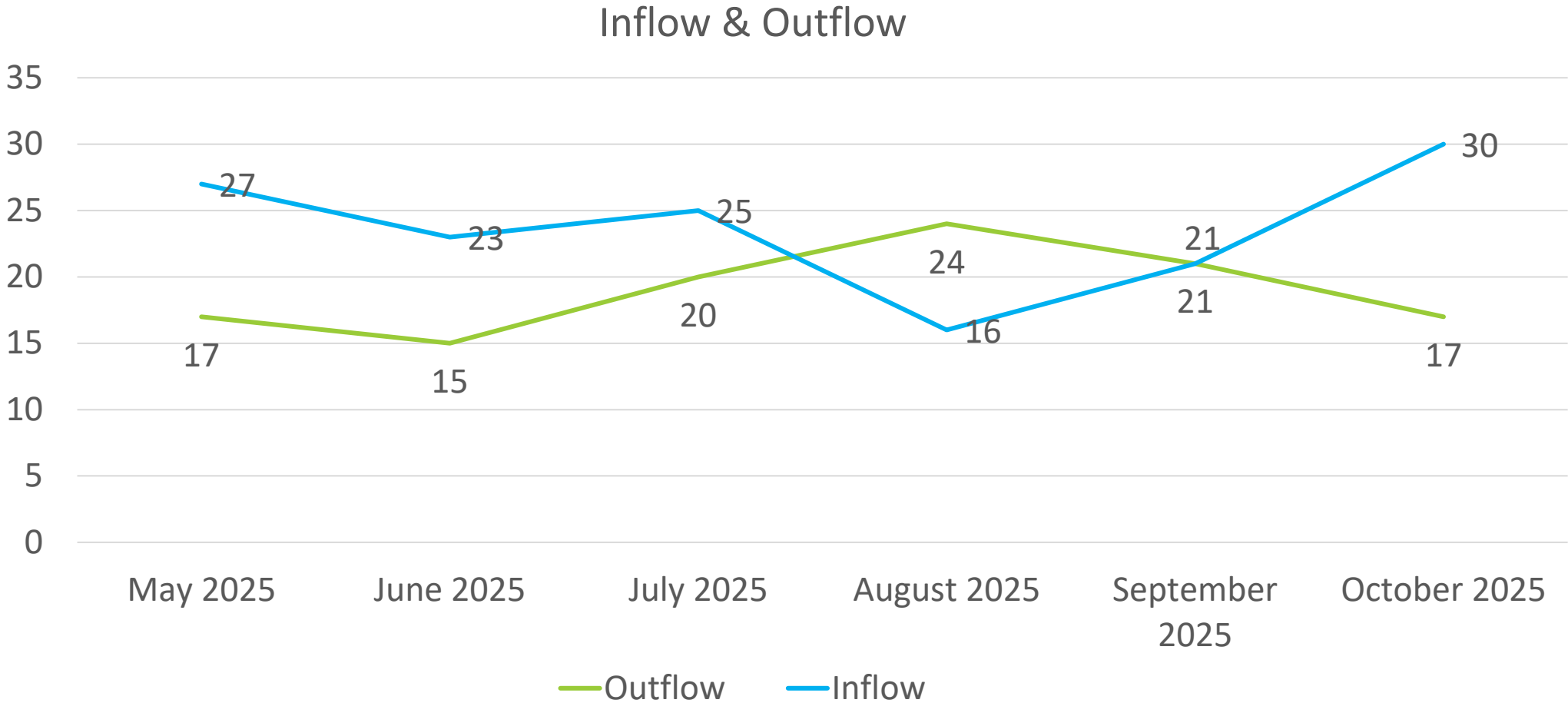
6 Month Trends

Active on PATHS



6 Month Trends

93



Current Active⁹⁴ on PATHS: 665

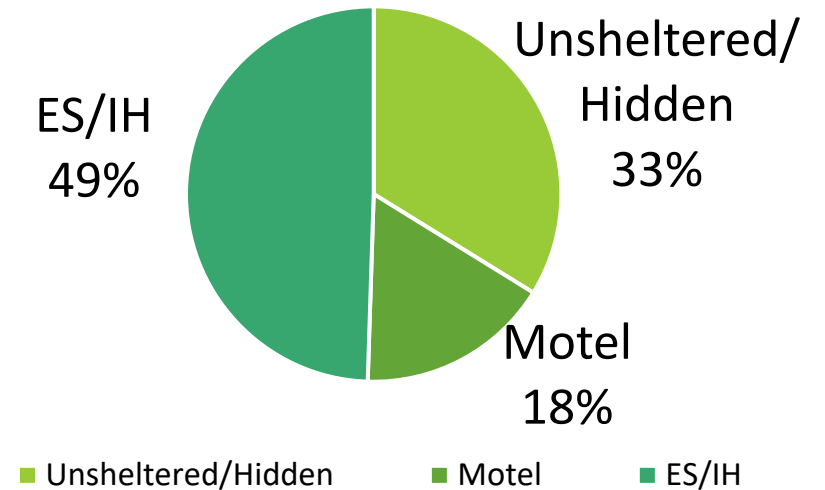
Demographics

- Age:
 - Youth: 17
 - 26-40: 291
 - 41-50: 196
 - 51-65: 150
 - 65+: 13
- Gender-id.:
 - Men: 66% (440)
 - Women: 33% (220)
 - Gender Diverse: 1% (4)
- Year that people were added to PATHS
 - 2025: 208
 - 2024: 188
 - 2023: 94
 - 2022: 65
 - 2021: 40
 - 2020: 35
 - Pre-2020: 37

Most recent stay

- Emergency shelter / Interim housing: 251
- Motel: 82
- Unsheltered / hidden: 166

Most Recent Stay



**71**

People accessed the Family Shelter in
October 2025

29 adults (26+)
15 youth (16-25)
27 children (0-15)

3

Families housed
from
homelessness in
October

67

Average days in
Emergency
Shelter (Q2)

****Note:** The above data was calculated by family unit.

Demographics in Adult Shelter, Bed Availability B-1-10590

	Total occupied beds/ total beds available; Oct. 14	Total occupied beds/ total beds available; Nov. 18
Cambridge Shelter	95%	100%
HoF Shelter Care	101%	102%
SHIP- Edith Mac	95%	100%
SHIP- 84 Frederick St	85%	91%
YW Cambridge	95%	95%
OneROOF	88%	75%
BridgeCare	86%	71%
Erb's Road	98%	98%
Total % of Chronicity in ES system	95%	95%

Cismen, transmen, 25/26+:
0 beds available

Ciswomen, transwomen, and gender
diverse individuals, 25/26+:
5 beds available

All genders, 18-25:
6 beds available

All genders, 26+, medically complex:
4 beds available* no intakes

All genders, 25+, outdoor shelter:
1 bed available

Chronic Homelessness in Adult Shelters

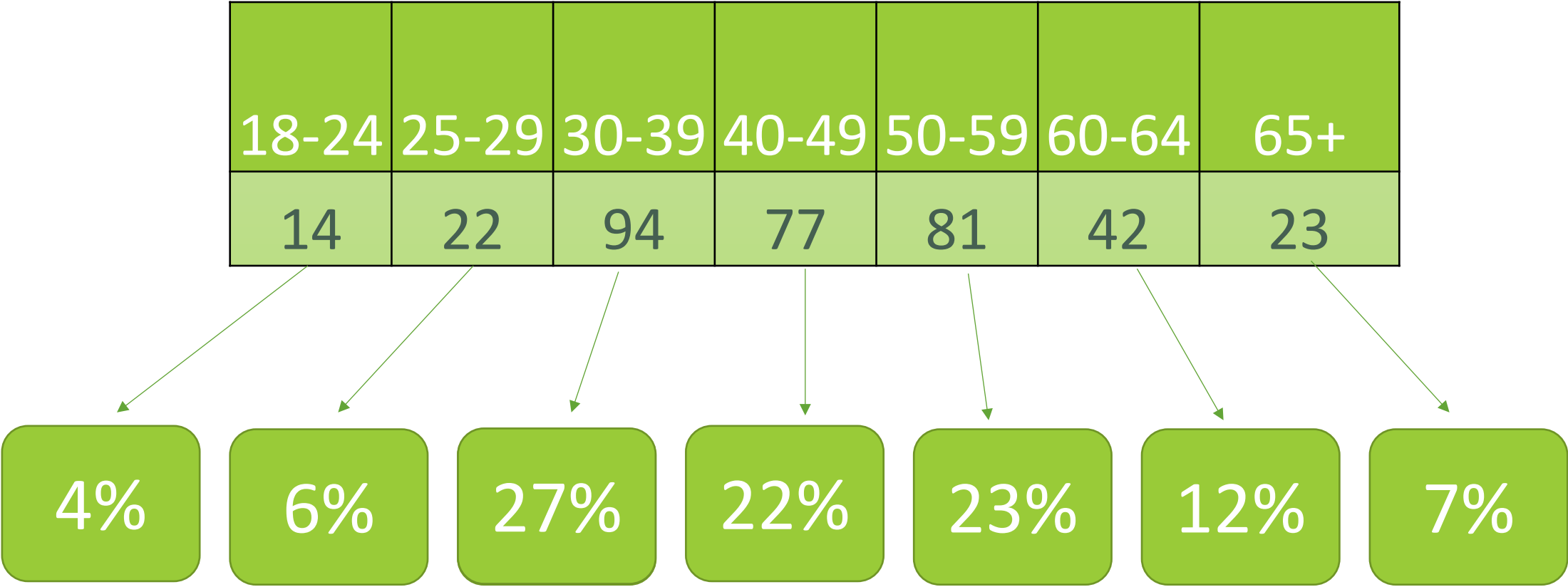
B-1-10591

97

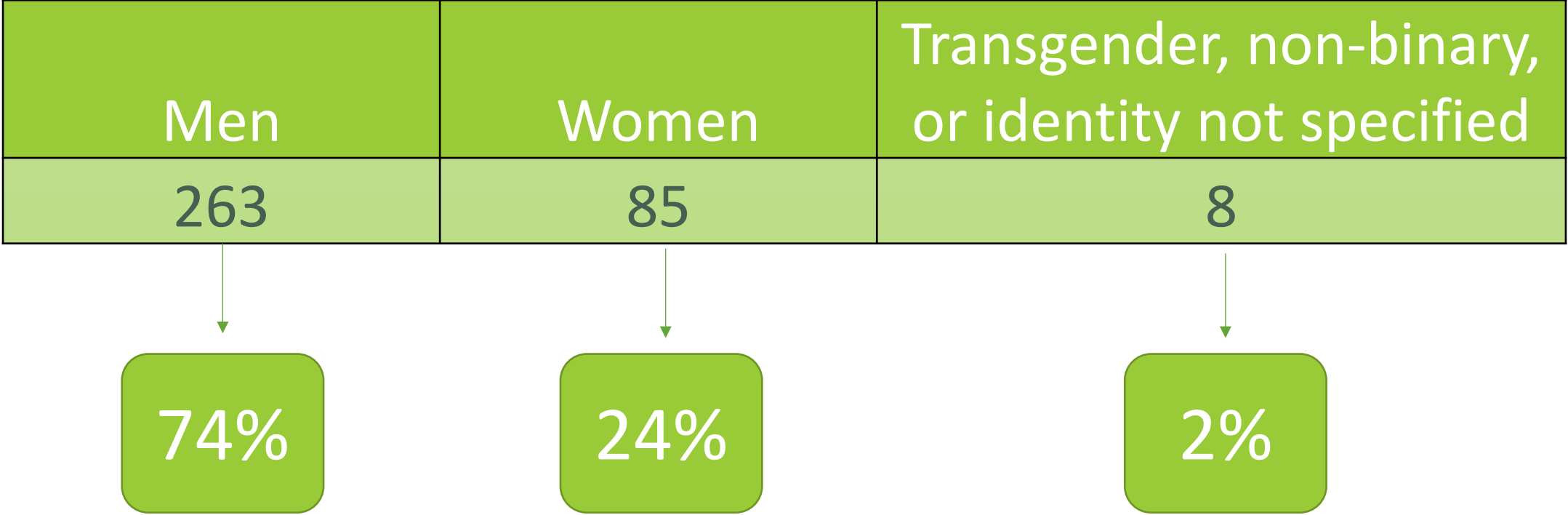
	Total Chronic Homeless Pop. / bed occupancy; July 22	Total Chronic Homeless Pop. / bed occupancy; Aug.20	Total Chronic Homeless Pop. / bed occupancy; Sept. 17	Total Chronic Homeless Pop. / bed occupancy; Oct. 14	Total Chronic Homeless Pop. / bed occupancy; Nov. 18
Cambridge Shelter	60%	50%	59%	46%	59%
HoF Shelter Care	88%	89%	85%	80%	88%
SHIP- Edith Mac	58%	76%	68%	60%	57%
SHIP- 84 Frederick St	68%	74%	73%	63%	74%
YW Cambridge	63%	80%	85%	63%	79%
OneROOF	50%	29%	38%	38%	44%
BridgeCare	86%	79%	77%	75%	70%
Erb's Road	96%	96%	96%	96%	96%
Total % of Chronicity in ES system	74%	67%	74%	67%	74%

B-1-10591

Age Demographics in Adult Emergency Shelters

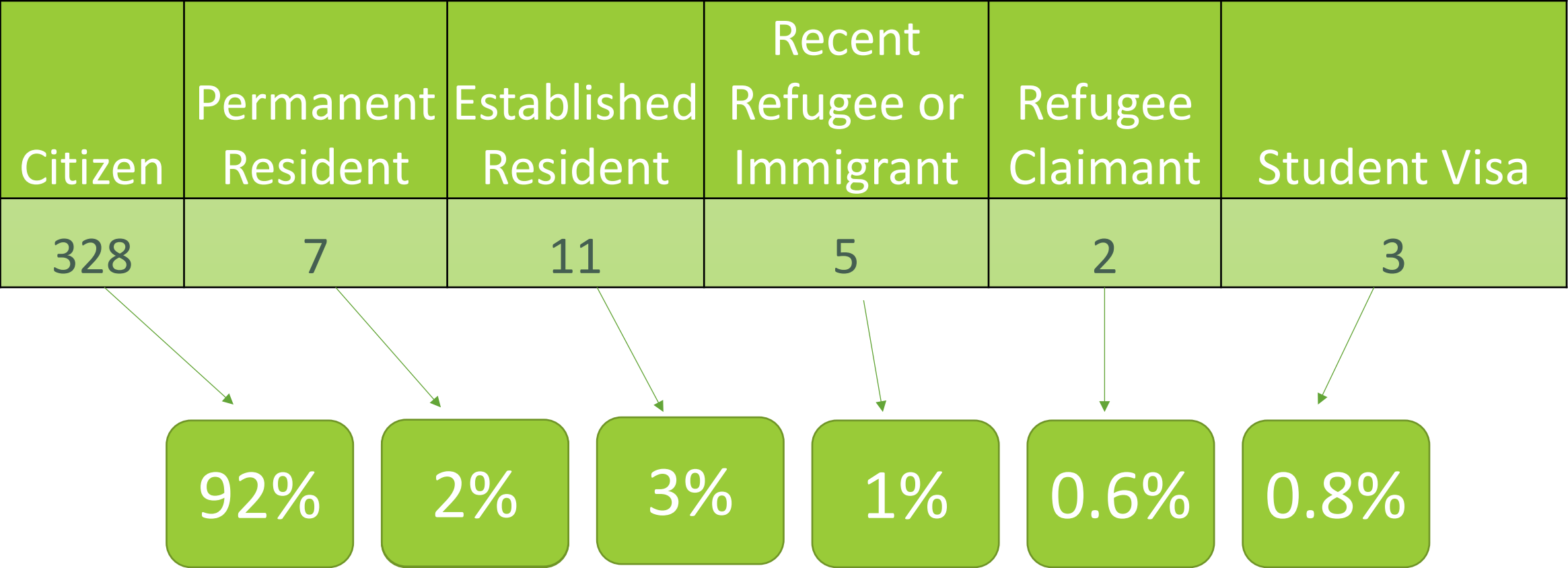


Gender in Adult Emergency Shelters



Of the individuals who identified as transgender, non-binary or their identity was not specified, 50% were experiencing chronic homelessness.

Citizenship and Immigration Status in Adult Emergency Shelters



**THE REGIONAL MUNICIPALITY OF
WATERLOO**
Applicants

and

**PERSONS UNKNOWN AND TO BE
ASCERTAINED**
Respondents

Court File No.: CV-25-00000750-0000

101

**ONTARIO
SUPERIOR COURT OF JUSTICE**

Proceeding commenced at KITCHENER

3rd AFFIDAVIT OF SARA ESCOBAR

WATERLOO REGION COMMUNITY LEGAL SERVICES
450 Frederick Street, Unit 101
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Lawyers for the Respondents

TAB 12

Court File No. CV-25-00000750-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

THE REGIONAL MUNICIPALITY OF WATERLOO

Applicant

and

PERSONS UNKNOWN AND TO BE ASCERTAINED

Respondents

2nd AFFIDAVIT OF LAURA PIN

I, Laura Pin, of the City of Hamilton, in the Province of Ontario, AFFIRM AND SAY:

1. The facts and opinions contained in this affidavit are based on my own research and experiences as well as information not based on my personal knowledge, which I believe to be credible and true.
2. I am an Associate Professor and researcher at Wilfrid Laurier University. I currently lead a multi-year federally funded research project reviewing municipal policy responses to encampments through a human rights lens.

Mandate

3. I previously affirmed an affidavit on July 9, 2025 in this matter, which is included in the Respondent's Supplemental Responding Application Record, Volume 1. I adopt and rely upon that Affidavit and Exhibits, particularly Exhibit "A" which is my current curriculum vitae.
4. Waterloo Region Community Legal Services has commissioned me to prepare an expert report in the litigation of *The Regional Municipality of Waterloo and Persons Unknown and to be Ascertained*.
5. I have been mandated to provide my opinion on the following topics:
 - a. The consultation process performed by the Region of Waterloo (the "Region") before passing By-law Number 26-001 ("Amended By-law") which amended By-law Number 25-021 of the Region, *A By-law Respecting the Use of 100 Victoria Street North, Kitchener (as Owned by The Regional Municipality of Waterloo) to facilitate the Kitchener Central Transit Hub and other Transit Development*;
 - b. Whether the Amended By-law's definition of "Resident" as amended at subsection 1(7) is compliant with the Region's Plan to End Chronic Homelessness ("PECH"); and
 - c. Whether the Transition Protocol as set out in Schedule "C" of the Amended By-Law complies with the Region's Plan to End Chronic Homelessness.

Background and nature of work

6. I have been a faculty member at Wilfrid Laurier since 2021 in the Department of Political Science and North American Studies. I received my doctoral degree from York University in 2019 and completed post-doctoral training in the Department of Political Science and Community Engaged Scholarship Institute at the University of Guelph from 2019 to 2021.
7. My expertise is on housing and homelessness policy in Canada. I have extensive experience working with people experiencing homelessness, that is, individuals without permanent, adequate housing, who may occupy emergency shelters, transitional housing, or places not intended for human habitation, such as parks, abandoned buildings, or vehicles. I also have research expertise in participatory democracy and municipal politics. I have conducted research on housing, homelessness, and inclusive policymaking with municipal governments, as well as national bodies like the National Housing Council. I currently lead a multi-year federally funded research project reviewing municipal policy responses to encampments through a human rights lens. In addition, I have been part of the Plan to End Chronic Homelessness (PECH) Co-Creators table since it was first established.

Consultation Process

8. The Region's *Guidelines for Public Engagement* ("Guidelines") provide the standard against which I assess the consultation process undertaken prior to the passage of the Amended By-law concerning 100 Victoria Street North (the "Encampment"). The Guidelines state that the Region is committed to "transparent, responsive and inclusive processes" and emphasize that public engagement should involve those most impacted by a decision and identify, prevent,

and remove barriers to participation for groups with unique needs and challenges (2016, p. 1). Please find attached hereto as **Exhibit “A”** the Guidelines. My assessment is also informed by my expert knowledge of best practices for inclusive and meaningful consultation with marginalized populations.

January 7th, 2026, Public Meeting

9. On December 18, 2025, the Region posted a public notice of a special public meeting to receive input on proposed amendments to the 100 Victoria Street North Site-Specific By-law. The public notice was posted on the Region’s website. The meeting was scheduled for January 7, 2026, at 6:00 p.m. at 150 Frederick Street, Kitchener, with electronic participation available. Participation required advance registration through an online delegation form or by telephone. Written submissions could be provided by email. Information about participation was published on the Region’s website.

10. The consultation process, made participation highly impractical for individuals with lived experience staying at the Encampment, the population most directly affected by the bylaw amendment. Participation required access to the internet, email, or a telephone and the ability to complete advance registration. These requirements presume a level of digital access and administrative capacity that many individuals experiencing homelessness typically do not have. Individuals staying at or accessing services at the Encampment have limited and

inconsistent access to digital devices, charging facilities, and private spaces in which to complete these tasks.¹

11. Public notice was issued on December 18, 2025, immediately prior to the Christmas holiday period, with the meeting scheduled for the first full week following the holiday break. Many community organizations and service providers that support individuals experiencing homelessness operate with reduced hours or closures during this period. As service providers often function as key intermediaries for sharing information about engagement opportunities, this timing significantly reduced the likelihood that notice of the meeting would reach those most affected.
12. The meeting location at 150 Frederick Street is 1.5 km from the Encampment. Attending the meeting required individuals to pay for transportation or undertake a 22-minute walk. Individuals residing in encampments are often reluctant to leave their belongings unattended due to the risk of theft or removal.² In addition, the meeting was scheduled for 6:00 p.m. on a weekday evening, a time that often conflicts with meal services, shelter intake, and safety considerations. Best practices in inclusive consultation emphasize adapting format and location to the lived realities of affected populations, including holding consultations on-site.³

¹ Huhtasalo, J., Vähätalo, M., Niemi, V., Hietala, S., & Rasinkangas, J. (2025). [Understanding the intertwined dynamics between digitalization, homelessness and social marginalization—An integrative literature review](#). *Finnish Journal of eHealth and eWelfare*, 17(4), pp. 472-486.

² Olson, N., & Pauly, B. (2023). [‘Forced to become a community’: Encampment residents’ perspectives on systemic failures, precarity, and constrained choice](#). *International Journal on Homelessness*, 3(2), pp. 124-138.

³ Siddiqui, F. R. (2014). [Annotated bibliography on participatory consultations to help aid the inclusion of marginalized perspectives in setting policy agendas](#). *International journal for equity in health*, 13(1), p. 124.

13. The meeting was held in a Regional administrative building and followed a formal council-delegation structure. Such environments can be intimidating and unwelcoming for individuals who have experienced marginalization or negative interactions with authorities. Rigid procedural requirements discourage participation by individuals without experience navigating governmental processes.⁴ Inclusive engagement with people with lived experience typically involves meeting people in familiar and trusted spaces.⁵
14. Taken together, the procedural requirements, timing, location, and format of the January 7, 2026 consultation created substantive barriers to participation that are inconsistent with the Region's stated commitment to inclusivity.

January 5, 2026 Drop-In Consultation

15. The Region also held a drop-in consultation for residents of the Encampment on January 5, 2026, from 6:00 p.m. to 7:00 p.m. at the Kitchener Public Library. According to the Region's consultation summary which was attached to the January 9, 2026 Report to Council as Appendix "C", the event was advertised through signage at the site posted on December 22, 2025.
16. On January 5, 2026, a volunteer at the Encampment, Jacara Droog, observed a single poster advertising the consultation attached to a security portable at the encampment. The poster was

⁴ Einstein, Katherine Levine, Maxwell Palmer, and David M. Glick. (2019). ["Who participates in local government? Evidence from meeting minutes."](#) *Perspectives on politics* 17.1: pp. 28-46.

⁵ Tamarack Institute. (2019). Engaging People with Lived/Living Expertise <https://www.tamarackcommunity.ca/hubfs/Resources/Publications/10-Engaging%20People%20With%20LivedLiving%20Experience%20of%20Poverty.pdf>

difficult to see and visibly weather-damaged, please find attached hereto as **Exhibit “B”** a picture of this poster taken at the Encampment by Mx. Droog. A search of the site did not reveal additional posters. Mx. Droog spoke with approximately ten individuals at the site, only one of whom was aware of the consultation taking place that evening. According to the Region’s consultation summary, three individuals with experience staying at the Encampment attended the drop-in session, though the extent of their participation is unclear.

17. This session also had significant limitations. The drop-in session was not included in the December 18th public notice and was not distributed through the Co-Creators email listserv. I am not aware of any service providers regularly working with residents of the Encampment receiving notice of the session. The only communication method identified by the Region in their summary of consultation was signage posted at the site. Written notice alone is insufficient for effective engagement with people experiencing homelessness, many of whom face literacy barriers, cognitive disabilities, or mental health challenges.⁶ Written notice also lacks the relational context necessary to explain the purpose of the consultation, address concerns, and support participation.⁷ Verbal communication allows for explanation, clarification, and reassurance, especially in situations that involve dealing with unfamiliar bureaucratic processes, like consultation. Moreover, individuals may need help understanding how to participate, whether transportation or virtual access is required, how to speak at the meeting, and reminders.⁸

⁶ Olson, N., & Pauly, B. (2023). ‘Forced to become a community’, *supra*, pp. 124-138.

⁷ Tamarak Institute. (2019). Engaging People with Lived/Living Expertise., *supra*.

⁸ Feige, S., & Choubak, M. (2019). Best practices for engaging people with lived experience. *Community Engaged Scholarship Institute*. <https://atrium.lib.uoguelph.ca/server/api/core/bitstreams/0b9b1e82-c0f4-4729-ae35-b07356d98922/content>

18. The Kitchener Public Library is approximately 1.4 km from the encampment, creating the same transportation and safety barriers described above. The session was again scheduled for 6:00 p.m. on a weekday evening, a time that commonly conflicts with survival-related activities.⁹ The session occurred on the first day of the first full week following the holiday period, further limiting opportunities for community organizations to assist with outreach.
19. In my opinion, the consultation process related to the Amended By-law was inconsistent with the Region's *Guidelines for Public Engagement*, specifically the stated commitment to inclusivity and to identifying, preventing, and removing obstacles to participation for groups with unique needs and challenges. In my opinion, the consultation process related to the Amended By-law is also not consistent with established best practices for inclusive and meaningful consultation with marginalized and structurally excluded populations.

Definition of Resident

20. The Amended By-law defines a "Resident" of the Encampment as "anyone residing at the encampment as of April 16, 2025" (Appendix A to the January 9, 2026 Staff Report, item 4). I have been asked to provide my opinion as to whether this definition is consistent with the Region's *Plan to End Chronic Homelessness* ("PECH").
21. In my opinion, the definition of "Resident" adopted in the Amended By-law is not consistent with the PECH. The definition attempts to fix residency as a static status that can be definitively

⁹ Office of the Federal Housing Advocate & Canadian Human Rights Commission. (2025). Actions to facilitate participation in decision-making (Factsheet 6/8) in Guide to meaningful engagement and integrating a human rights-based approach into encampment responses. Homeless Hub. https://homelesshub.ca/wp-content/uploads/2025/05/Actions-to-Facilitate-Participation-in-Decision-Making_factsheet-6.pdf

determined at a single point in time, based on presence on one specific date and at the moment of enumeration. This approach does not align with how chronic homelessness is understood or addressed within the PECH.

22. The PECH identifies four core interventions, including: (2) Community-Driven System Leadership; (3) Centring Lived Expertise and Equity-Owed Groups; and (4) Defining and Combining Housing First and Human Rights Approaches. The definition of “Resident” is inconsistent with each of these interventions.
23. Interventions 2 and 3 emphasize the importance of community-driven leadership, centring lived expertise, and shifting the homelessness response system to be accountable to the needs of people experiencing homelessness, see PECH at p. 36. The definition of “Resident” was developed and applied by the Region without input from individuals staying at the Encampment or from service providers with ongoing, direct relationships with people using the site. In my opinion, this absence of community and lived-experience input undermines the accuracy and legitimacy of the definition.
24. As a result of this approach, the definition is likely to exclude individuals who regularly rely on the Encampment but were not present or visible at the time of enumeration. Individuals experiencing homelessness may actively avoid being counted or observed by government staff or their proxies, including bylaw enforcement or security personnel, due to fear of enforcement, displacement, or negative prior experiences. Enumeration processes that do not

integrate trusted community partners or lived expertise are widely understood to undercount individuals experiencing homelessness.¹⁰

25. Further, chronic homelessness is characterized by instability and mobility. Individuals experiencing homelessness frequently move between locations in response to access to food, shelter, safety, social networks, and enforcement pressures.¹¹ Presence or absence at a single location on a single date is not a reliable indicator of whether a person regularly uses that space to rest, shelter, or meet basic needs. Some individuals may rely on the Encampment primarily at night, others intermittently, and others seasonally or in response to changing circumstances. A definition of “Resident” grounded in lived expertise would recognize these patterns of use and attachment to place.

26. Intervention 4 of the PECH emphasizes a human rights approach. The PECH defines a human rights approach as one in which people experiencing homelessness are treated as rights holders, their agency is respected, and the Region recognizes a duty of care with respect to their housing needs. In my opinion, the definition of “Resident” in the Amended By-law is inconsistent with this approach. By limiting recognition of residency to individuals present at a single moment in time, the definition denies agency to individuals to identify themselves as residents of the Encampment or as having a legitimate stake in the space, even where the site is essential to their day-to-day survival.

¹⁰ Pin, L., & Haley, T. L. (2022). [On the edge of the bubble: Homelessness and near homelessness on the rural-urban fringe in Canada](#). *Journal of Rural and Community Development/Revue du développement rural et communautaire*, 17(4).

¹¹ Olson, N., & Pauly, B. (2023). ‘Forced to become a community’, *supra*.

Transition Protocol

27. The Transition Protocol as set out in Schedule “C” of the Amended By-Law describes how the Region will transition individuals from the Encampment to other locations. There are four key components to the transition protocol. First, the protocol states “Make best efforts to offer development of an Individual Housing Plan (“IHP”) to Residents who accept such offer. Second, “Offer a Resident Alternative Accommodation as set out in their IHP”. Third “Offer social service supports, in the same nature as provided at the encampment, to a Resident once moved to Alternative Accommodation”. Fourth “Offer a Resident transportation, including personal belongings, to Alternative Accommodation and coverage for up to 6 months”.
28. In my opinion, there are some positive elements to the Transition Protocol, including a stated commitment to alternative accommodations, as well as commitments to service provisioning and transportation. However, it must be emphasized again that these services outlined in the Transition Protocol are only for those deemed Residents by the Region, meaning anyone else currently living at the Encampment but not counted as residing there on April 16, 2025 are excluded from these services.
29. Several elements of the Protocol are inconsistent with the PECH. As mentioned previously, throughout the PECH both housing first and human rights are defined and integrated throughout the PECH, notably in Intervention 4, but also in other places in the document. A consistency in both housing first and human rights is an understanding that addressing chronic homelessness requires housing.

30. The PECH references national and international human rights law, with respect to the right to housing (pages 17 and 42). Key human rights documents at the national and international level note that individuals in encampments should not be displaced from encampments to other forms of homelessness.^{12,13} Similarly, a housing first approach requires setting up individuals experiencing homelessness with housing and living supports.¹⁴ Yet three of the four types of “alternative accommodations” referenced in the Transition Protocol (emergency shelter, transitional shelter, motels/hotels) involve a perpetuation of homelessness, and not the provision of housing. By moving individuals from one temporary and precarious setting to another, without securing permanent housing and supports, these measures cycle people through crisis responses rather than resolving their homelessness. Given the Point-in-Time Count numbers in the Region, this is not due to a failure of service providers or staff as individuals, but a structural shortage of affordable and/or supportive housing in the Region.

31. This reality is reflected in the January 13, 2026 report from the Association of Municipalities of Ontario, “Municipalities Under Pressure One Year Later: An Update on the Human and Financial Cost of Ontario’s Homelessness Crisis”, which is attached hereto as **Exhibit “C”**. The report states that in 2025, an estimated 84,973 Ontarians experienced known homelessness which was a 7.8% increase from 2024.¹⁵ It also reports that growth in chronic homelessness is due to the limited availability of appropriate and affordable housing, with many people cycling

¹² Flynn, A., Hermer, J., Leblanc, C., MacDonald, S-A., Schwan, K., & Van Wagner, E. (2022). *Overview of encampments across Canada: A right to housing approach* (Report). Office of the Federal Housing Advocate & Canadian Human Rights Commission. https://homelesshub.ca/wp-content/uploads/2024/04/Overview-of-Encampments-Across-Canada_EN_1.pdf

¹³ OHCHR. (2007). Right to Adequate Housing.

https://www.ohchr.org/sites/default/files/Documents/Publications/FS21_rev_1_Housing_en.pdf

¹⁴ Evans, J., Collins, D., & Anderson, J. (2016). [Homelessness, bedspace and the case for Housing First in Canada](#). *Social Science & Medicine*, 168, pp. 249-256.

¹⁵ Exhibit “C”, Association of Municipalities of Ontario, “Municipalities Under Pressure One Year Later: An Update on the Human and Financial Cost of Ontario’s Homelessness Crisis”, p. 8.

through shelters, temporary accommodations, and other emergency responses because of the few options to exit into stable housing.¹⁶

32. Without a real exit for residents of the Encampment into stable housing it is my opinion that there will continue to be those who will need a safe place to tent in the Region. The Transition Protocol does not take into account this need if the Encampment at the encampment is no longer available. There are no alternate tenting sites offered in the Transition Protocol.
33. As such, due to the exclusion of many residents at the Encampment from the Protocol and the reliance on types of accommodation options that perpetuate the cycle of homelessness, I find the Transition Protocol inconsistent with both a human rights and housing first approach as outlined in PECH.
34. I make this Affidavit in support of the Respondent's Application and for no improper purpose.

SWORN remotely by Laura Pin at the City of Hamilton, in the Province of Ontario, before me at the County of Wellington in the Province of Ontario on February 20, 2026 in accordance with O. Reg. 431/20.



**Joanna Mullen, A Commissioner
of Oaths (LSO#: 64535V)**



Laura Pin

¹⁶ *Ibid*, p 10.

THIS IS **EXHIBIT "A"** REFERRED TO
IN THE AFFIDAVIT OF LAURA PIN
SWORN REMOTELY AT THE CITY
OF HAMILTON BEFORE ME AT THE
COUNTY OF WELLINGTON DURING
A VIDEOCONFERENCE IN
ACCORDANCE WITH O.REG. 431/20,
ADMINISTERING OATH OR
DECLARATION REMOTELY THIS 20th
DAY OF FEBRUARY, 2026

A handwritten signature in black ink, appearing to be 'Joanna Mullen', written over a horizontal line.

Joanna Mullen, A Commissinoer of Oaths
(LSO#: 64535V)



Guidelines for Public Engagement at the Region of Waterloo

Commitment to Public Engagement

The Regional Municipality of Waterloo is committed to transparent, responsive and inclusive processes to ensure the public is engaged in Regional business. This includes promotion of public engagement and creating an environment that fosters public engagement.

Definitions

- 1) Public: Any citizen, group, community, business, non-profit, and other stakeholder who may be impacted by or interested in Region of Waterloo issues and decisions
- 2) Public engagement: Providing opportunities for the public to have an informed say on the issues and decisions that affect their lives through a dialogue of mutual respect between government and the public
- 3) Inform: To provide the public with balanced and objective information to assist them in understanding issues, decision-making, alternatives, opportunities and solutions
- 4) Consult: To obtain public input for consideration in issues, analysis, alternatives and decisions
- 5) Involve: To work directly with the public throughout the process to generate ideas and ensure that public concerns and aspirations are consistently understood and considered.
- 6) Collaborate: To work with the public in the decision-making process including the development of alternatives and the identification of preferred solutions and to ensure that public concerns are consistently understood and considered

Guiding Principles

Regional employees are responsible for engaging the public on issues or decisions that may impact them and to keep them informed of Regional issues.

Regional employees and contracted consultants are responsible for ensuring public engagement is conducted in accordance with the Regional values of service, integrity, respect, innovation and collaboration.

Accountability:

- The Region of Waterloo is responsible for its actions, decisions and policies and may be required to explain them and be answerable for resulting consequences

- Public engagement processes will demonstrate a commitment to being time-sensitive, cost-effective and demonstrate that results and outcomes are consistent with expectations
- Where applicable, the Region of Waterloo will follow decision-making protocols and jurisdictions at the municipal, regional, provincial and federal level

Transparency:

- The Region of Waterloo is open, clear and visible to the citizens it serves when conducting business in order to build trust and confidence in government
- Public engagement processes will demonstrate openness, honesty and clarity of purpose when engaging the public and ensure the same applies when communicating results

Respect:

- Public engagement processes will value and respect citizens.

Inclusivity:

- Public engagement processes will include ways to involve members of the community who are most impacted by a particular issue or decision
- Public engagement processes will identify, prevent and remove barriers to participation, recognizing that certain groups have unique needs and challenges that impact their ability to fully participate in decision-making processes

Responsiveness:

- Public engagement processes will be proactive in addressing public concerns, being flexible in responding to changing needs and conditions

Regional employees acknowledge that public engagement processes built on the principles of accountability, transparency, respect, inclusivity and responsiveness can:

- Include early identification of public issues and concerns
- Increase the involvement of the public in decision-making processes
- Increase civic pride
- Decrease barriers to participation
- Increase understanding about how Regional government works
- Ensure neighbourhood level influence reflects region-wide benefits/interests
- Create better, more informed decisions

Public Engagement Process Steps

The Region of Waterloo follows consistent principles to ensure that public engagement is incorporated into Regional business to maximize customer expectations with policy decisions. The process of public engagement may not always be linear and can be broken into six steps: Assess, Select, Plan, Implement, Report and Evaluate. These steps are defined below.

Step 1 – Assess:

Assess why public engagement should be sought:

- a) Identify the purpose or goals and intended outcome of the public engagement process; determine why you are engaging the public
- b) Identify the benefits and risks of engaging the public in this process
- c) Identify what is needed from the public for this process
- d) Outline the timelines for the public engagement process
- e) Identify additional resources that may be needed

Step 2 – Select Project Scope:

The Region values contributions from the public to support Regional decision-making processes.

- a) Determine the level of public engagement using the assessment information from Step 1:
 - The Region of Waterloo defines the types of public engagement as inform, consult, involve, and collaborate.
 - A given public engagement project may have different types of engagement, but it is reasonable for there to be a primary type that defines the scope of the project. Examples of engagement techniques include fact sheets, open houses, focus groups, surveys, public meetings, citizen advisory committees, consensus-building, and workshops.
 - No two public engagement processes will be the same and the decision regarding the level of engagement, methods and the steps to follow will rest with staff to balance the need for engagement, capacity and legislated requirements, and available budget.

Step 3 – Plan the Public Engagement Process:

Develop a plan to engage the public including the following steps:

- a) Identify who from the public should be engaged in the process; determine what citizen, group, community, business, non-profit or other stakeholder may have interest or may be impacted
- b) Identify information to be shared with or sought from the public

- c) Determine the appropriate tools and techniques to be used to foster public engagement (methods of promotion, outreach and communication), including consideration of methods to engage those impacted by the issue or decision
- d) Identify potential barriers for members of the public to engage and determine tools to address those barriers
- e) Determine how success of the public engagement process will be measured for the purposes of evaluation; develop an evaluation plan, determine what evaluation questions are associated with the goals of the public engagement process and what indicators, metrics or benchmarks will be used to answer them

Step 4 – Implement the Initiative:

- a) Implement the public engagement initiative at the level identified in Step 2 and using the appropriate tools and techniques identified in Step 3
- b) Ensure the purpose and goals of the initiative identified in Step 1 are connected to the public engagement process so that the intended outcomes can be achieved
- c) When communicating with the public, use clear and plain language to help ensure that the information is understood by a broad audience
- d) When conducting public engagement ensure the Guidelines for Public Engagement at the Region of Waterloo document is readily available to the participants so they will clearly understand the principles behind public engagement at the Region of Waterloo

Step 5 – Report Back to Stakeholders:

When engaging the public at the consult, involve or collaborator levels it is part of the public engagement process to report back; depending on the level of engagement this can be done using various methods and at more than one time point.

- a) Report back to public stakeholders using appropriate methods on:
 - content of public engagement discussions
 - identified solutions
 - areas of agreement and disagreement
 - actions taken as a result of consultation process
 - the extent of the consultation; how many events or discussions were held and with whom
 - any other information specifically relevant to an engagement process
- b) Confirm with public stakeholders that the information collected is accurate and understood

Step 6 – Evaluate Public Engagement:

Measure the effectiveness of the public engagement:

- a) Address each of the evaluation questions identified in Step 3
- b) Measure the success of the public engagement process using the indicators, metrics or benchmarks identified in Step 3
- c) Use evaluation information for next steps in the project, feedback for future activities, and reporting on effectiveness of the process

Note * Evaluation is tied to the process and scope of the public engagement and therefore begins at Step 1 and Step 2 and should continue through the entire public engagement process

Monitoring and Support

Citizen Service shall be responsible for providing support to the guidelines and receiving related concerns or complaints.

Relevant Policies and Legislation:

[Notice Policy \(CL 7-07\)](#)

[Accountability and Transparency Policy \(CL 7-05\)](#)

[Standards for Accessibility Policy \(A 10-03\)](#)

[Municipal Act, 2001 S.O. 2001, c. 25](#)

[Municipal Freedom of Information and Protection of Privacy Act R.S.O. 1990, c.M.56](#)

[Personal Health Information Protection Act, 2004 S.O. 2004 c.3 Sch. A](#)

[Planning Act, R.S.O. 1990, c.P.13](#)

[Expropriations Act, R.S.O. 1990 c.E.26](#)

[Development Charges Act, 1997 Ont. Reg. 82/98](#)

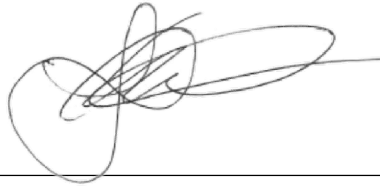
[Environmental Assessment Act, S.C. 1992, c.37](#)

[Accessibility for Ontarians with Disabilities Act, 2005 S.O. 2005 c.11](#)

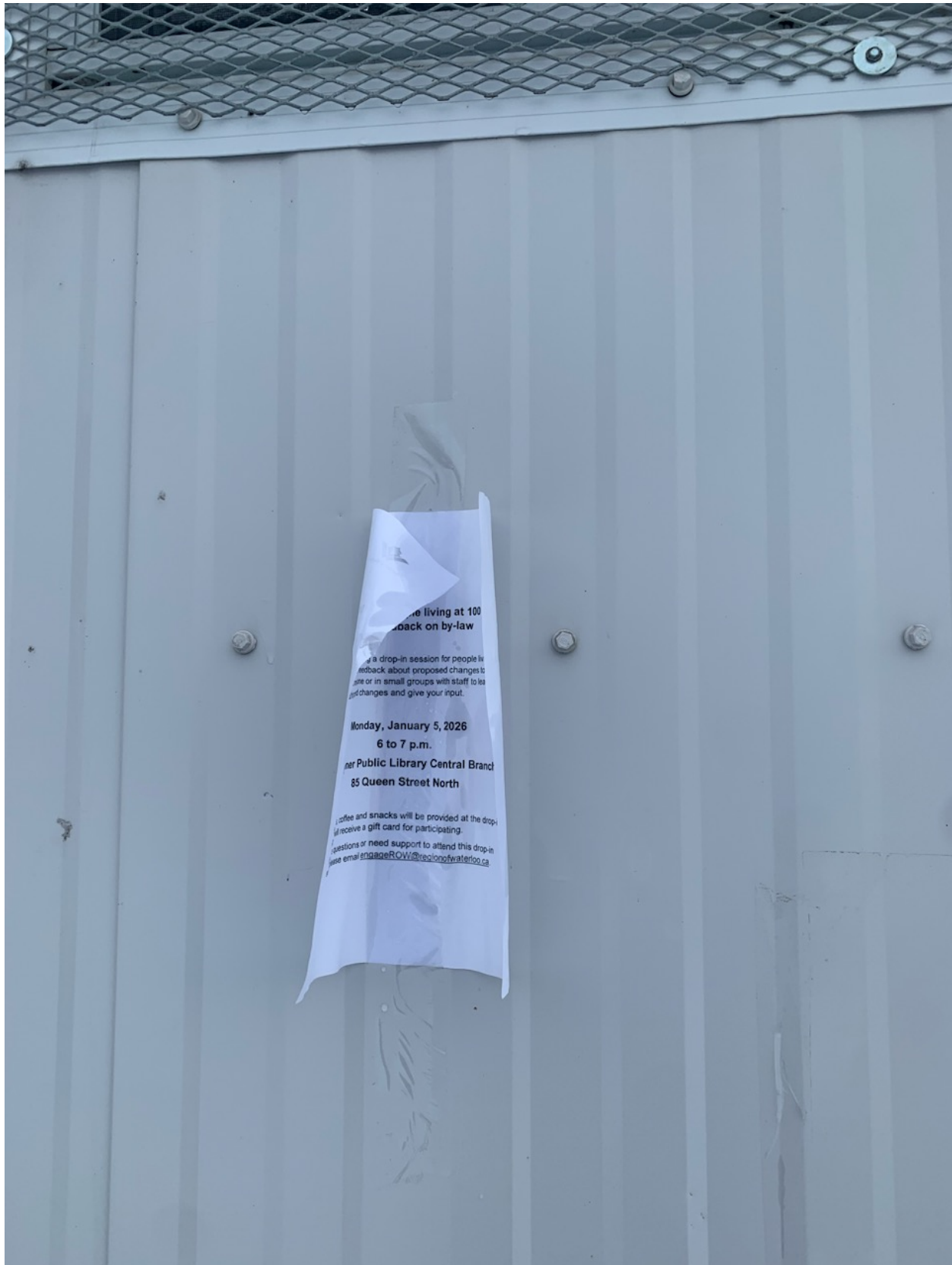
[Accessibility Standards for Customer Service Regulation Ont. Reg 429/07](#)

[Integrated Accessibility Standards Regulation Ont. Reg 191/11](#)

THIS IS **EXHIBIT “B”** REFERRED TO
IN THE AFFIDAVIT OF LAURA PIN
SWORN REMOTELY AT THE CITY
OF HAMILTON BEFORE ME AT THE
COUNTY OF WELLINGTON DURING
A VIDEOCONFERENCE IN
ACCORDANCE WITH O.REG. 431/20,
ADMINISTERING OATH OR
DECLARATION REMOTELY THIS 20th
DAY OF FEBRUARY, 2026

A handwritten signature in black ink, appearing to be 'Joanna Mullen', written over a horizontal line.

Joanna Mullen, A Commissinoer of Oaths
(LSO#: 64535V)



THIS IS **EXHIBIT “C”** REFERRED TO
IN THE AFFIDAVIT OF LAURA PIN
SWORN REMOTELY AT THE CITY
OF HAMILTON BEFORE ME AT THE
COUNTY OF WELLINGTON DURING
A VIDEOCONFERENCE IN
ACCORDANCE WITH O.REG. 431/20,
ADMINISTERING OATH OR
DECLARATION REMOTELY THIS 20th
DAY OF FEBRUARY, 2026

A handwritten signature in black ink, appearing to be 'Joanna Mullen', written over a horizontal line.

Joanna Mullen, A Commissinoer of Oaths
(LSO#: 64535V)

January 2026

Municipalities Under Pressure One Year Later:

An Update on the Human and Financial Cost of Ontario's Homelessness Crisis



About this report

This report updates *Municipalities Under Pressure: The Human and Financial Cost of Ontario's Homelessness Crisis* (Donaldson, Wang, Escamilla, & Turner, 2025), published in January 2025, and developed under the leadership of the Association of Municipalities of Ontario (AMO), the Ontario Municipal Social Services Association (OMSSA), and the Northern Ontario Service Deliverers Association (NOSDA).

The previous report established a province-wide baseline of known homelessness from 2016 onward and examined regional patterns, impacts on key populations, housing and homelessness investments across governments, and projected homelessness under different socioeconomic conditions.

This update applies the same approach using complete 2024 data and year-to-date 2025 information. It provides updated estimates of homelessness and chronic homelessness, community housing waitlists, housing and homelessness funding and expenditures, and encampments. The methods, assumptions, and limitations from the original report remain in effect unless otherwise noted.

Further detail on data sources, assumptions, and analytical methods is provided in the Technical Appendix.

About HelpSeeker

HelpSeeker Technologies is a Canadian social innovation company dedicated to helping communities, nonprofits, and government agencies solve complex social challenges through data, technology, systems insight, and modelling.

We design and implement data-driven tools, including scenario modelling grounded in structured logic models that connect investments and program changes to real-world outcomes over time. This enables organizations and policymakers to test strategies before committing resources, strengthen long-term planning, and make more informed, cost-effective decisions.

Donaldson, J., Kandyba, L., Wang, D. (2026). Municipalities Under Pressure One Year Later: An Update on the Human and Financial Cost of Ontario's Homelessness Crisis. HelpSeeker.

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Contributions

The data in this report is generated through people seeking housing and homelessness support across Ontario. Individuals share information as part of accessing services, often in the hope of improving their housing outcomes. This report is only useful insofar as it supports those efforts by improving understanding of system conditions and informing more effective responses.

This work also reflects the contributions of community agencies, frontline staff, and Ontario's 47 municipal Service Managers who support individuals, families, and communities experiencing homelessness and housing instability, and who are responsible for collecting, maintaining, organizing, and interpreting homelessness and housing data in their communities. Their ongoing participation and reporting make a province-wide analysis of homelessness possible.

This report builds on the original Municipalities Under Pressure analysis and was developed in collaboration with the Association of Municipalities of Ontario (AMO), the Ontario Municipal Social Services Association (OMSSA), and the Northern Ontario Service Deliverers Association (NOSDA). Key contributions to this work were provided by Michael Jacek and Alicia Neufeld (AMO), Fern Dominelli (NOSDA), and Aaron Stauch and Tod Duncan (OMSSA), who supported interpretation, contextualization, and review throughout the project.

Design, copyediting, and technical work were supported by Camilo Escamilla, Kim Harper, Hedgehog Writing & Editing, and others on the HelpSeeker team.

Executive summary

MUNICIPALITIES UNDER PRESSURE WAS PUBLISHED IN JANUARY 2025 TO ESTABLISH A PROVINCE-WIDE BASELINE OF HOMELESSNESS IN ONTARIO USING DATA FROM 2016 TO 2024.

The report showed that homelessness was rising faster than housing and homelessness-serving systems could respond, even as municipalities increased funding and expanded services, and identified the need for sustained investment in housing supply, prevention, supportive housing, and exit capacity, a need that remains today.

Since the release of that report, the socioeconomic environment and policy priorities at both the provincial and federal levels have changed, while housing affordability pressures, economic risks, and fiscal constraints remain elevated and continue to pose significant challenges, despite some easing from recent peak conditions (OECD, 2025; Bank of Canada, 2025).



More people are experiencing prolonged periods without housing, affecting community health, safety, and stability, while municipalities face growing operational, financial, and service-delivery pressures.

THESE PRESSURES REFLECT NOT ONLY RISING DEMAND, BUT PERSISTENT LIMITS IN HOUSING AVAILABILITY AND EXIT CAPACITY ACROSS THE SYSTEM.



With the addition of 2025 data, this update builds on the 2024 findings and provides an opportunity to step back from a period of rapid change following the pandemic and consider what options exist to reverse homelessness when housing and support capacity remains constrained and fiscal conditions are tightening.

This report provides updated estimates of homelessness in Ontario, examines chronic homelessness, community housing waitlists, and housing and homelessness funding and expenditures, and presents projections of homelessness to 2035.

01

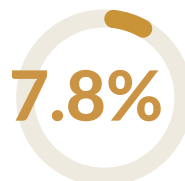
Homelessness increased in 2025.

In 2025, an estimated 84,973 people experienced known homelessness in Ontario, a 7.8% increase (6,171 people) from 2024, an increase that followed several consecutive years of growth.¹

While the rate of growth has moderated compared to the peak between 2021 and 2023, this past year's increase confirms that homelessness has not yet stabilized or decreased.

84,973

ONTARIANS EXPERIENCED
KNOWN HOMELESSNESS



INCREASE
FROM 2024

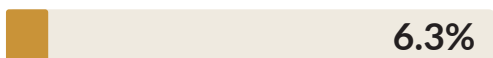
02

Homelessness growth accelerated sharply after 2021 and has not been reversed.

Between 2016 and 2020, known homelessness in Ontario increased gradually, by approximately 6.3% over four years. From 2021 to 2025, known homelessness increased by approximately 49.1%.

This acceleration coincides with the COVID-19 pandemic period. Homelessness has not returned to pre-2020 levels, even as housing and homelessness funding increased and services expanded. This indicates that the availability of housing and supports has not kept pace with the scale or persistence of homelessness following the pandemic.

2016 - 2020



VS

2021 - 2025



03

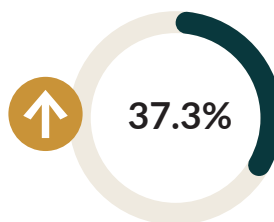
Homelessness is growing fastest in northern communities.

Homelessness is increasing more rapidly in Northern Ontario than elsewhere in the province. From 2024 to 2025, known homelessness in Northern Ontario increased by 37.3%. Since 2021, homelessness in the north has increased by approximately 117.5%, compared to 49.1% provincially over the same period. Northern communities, which account for approximately 5% of Ontario's total population, now account for nearly 10% of all known homelessness.



2024 - 2025

KNOWN HOMELESSNESS IN
NORTHERN ONTARIO



1. The 2024 figure in Municipalities Under Pressure (January 2025) was estimated using partial-year data. Updated data submitted by Service Managers have since been incorporated, resulting in a revised observed estimate for 2024.

04

Homelessness is also increasing rapidly in mostly rural communities.

Homelessness growth is also significantly higher in mostly rural Service Manager areas than the provincial average. In 2025, known homelessness in mostly rural communities increased by approximately 31.0% from 2024, compared to 7.8% provincially. Communities with a mix of rural and urban characteristics experienced growth of approximately 15.1% over the same period.

2024 - 2025 Rural Communities



VS

2024 - 2025 Provincially



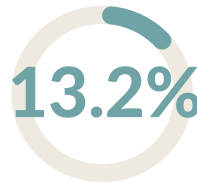
05

Indigenous people are significantly overrepresented among people experiencing homelessness.

Indigenous people in Ontario remain significantly overrepresented among those experiencing homelessness. Representing approximately 2.9% of the population (Statistics Canada, 2022), they account for an estimated 13.2% of people experiencing homelessness province-wide and 40.7% in northern communities.

The number of Indigenous people experiencing homelessness reported by Service Managers increased from approximately 6,100 in 2021 to over 11,000 in 2025. As homelessness grows, structural inequities, including racism and discrimination that drive the overrepresentation of Indigenous people are reproduced at a larger scale (Thistle, 2017).

2.9% OF THE
POPULATION



OF PEOPLE EXPERIENCING
HOMELESSNESS PROVINCE-WIDE

06

Encampments exist in most areas of Ontario in 2025.

Forty-two of 47 Service Managers reported at least one encampment, with nearly 2,000 site-based encampments estimated across the province. Most encampments are small, typically involving fewer than 10 people per site.

Service Manager reporting indicates that enforcement and site-management activities tend to change where encampments are located and how visible they are, often resulting in movement into vehicles, more hidden locations, or smaller, short-lived sites, rather than reducing the number of people experiencing homelessness.

42/47 SERVICE MANAGERS REPORTED
AT LEAST ONE ENCAMPMENT

2,000 SITE-BASED
ENCAMPMENTS

07

Lack of housing is increasing the duration and chronicity of homelessness.

In 2025, an estimated 45,111 people were experiencing chronic homelessness, representing 53% of all known homelessness in Ontario. Growth in chronic homelessness in-part reflects the limited availability of appropriate and affordable housing, with many people cycling through shelters, temporary accommodations, and other emergency responses because there are few options to exit into stable housing.

Homelessness in Ontario is increasingly characterized by conditions consistent with high inflow into homelessness and limited exit capacity, particularly limited access to affordable housing options that support timely exits.

In 2025, the community housing (RGI) waitlist reached an estimated 301,340 households, with an average wait time of 65 months and some households waiting more than 16 years. While RGI serves a broader population beyond people experiencing homelessness, these wait times point to limited system capacity to support exits from homelessness. As a result, more people remain homeless for longer periods.

In 2025, an estimated 45,111 people were experiencing chronic homelessness, representing 53% of all known homelessness in Ontario. Growth in chronic homelessness is consistent with an imbalance between the number of people entering homelessness and the availability of affordable housing options to support exits, with many people cycling through shelters, temporary accommodations, and other emergency responses because there are few options to exit into stable housing.

45,111

ONTARIANS EXPERIENCED
CHRONIC HOMELESSNESS



OF ALL KNOWN
HOMELESSNESS

08

Housing and homelessness funding has increased, but homelessness grows faster.

Public funding for housing and homelessness in Ontario has increased substantially while homelessness continues to rise. In 2025, combined housing and homelessness funding is estimated at just over \$4.0 billion, more than double the level reported in 2018. However, while the number of people experiencing homelessness increased by 49.1% between 2021 and 2025, total funding increased by 32.1% over the same period, with municipal funding increasing by 48.2%.

Over the same period, program expenditures increased by 75.4% overall—rising by 88.0% for homelessness programs and 66.1% for housing programs—indicating that municipalities are increasingly absorbing the cost of managing higher and more persistent levels of homelessness through local service delivery.

Emergency shelters have remained the largest area of homelessness-related expenditure, increasing by 51.6% since 2021. Community housing has remained the largest area of housing program expenditure, but spending declined by 0.6% over the same period, highlighting limited growth in deeply affordable housing despite rising need.

09

Homelessness is projected to more than double by 2035.

Factoring in updated assumptions about economic conditions, housing affordability, population change, and related drivers, homelessness in Ontario is projected to continue increasing through 2035.

Under steady conditions, known homelessness is projected to reach approximately 177,000 people province-wide by 2035. Under an economic downturn scenario, projected homelessness exceeds 297,000 people.

In Northern Ontario, homelessness is projected to increase from current levels to approximately 16,900 people under steady conditions and to more than 27,500 people under a downturn scenario by 2035. This reflects an amplified version of the broader provincial trend, with homelessness in the north growing much faster than funding and system capacity because of a lack of housing and limited service infrastructure.

UNDER STEADY CONDITIONS

177,000

VS

UNDER AN ECONOMIC DOWNTURN

297,000

10

Post-pandemic homelessness appears increasingly difficult to reverse.

The projections in this report show homelessness continuing to increase through 2035 under all modelled conditions. Observed trends since 2021 indicate that after homelessness rose above pre-pandemic levels, it did not return to those earlier levels, even after emergency responses expanded and short-term crisis conditions eased. Under current conditions, the system has not demonstrated the ability to reduce overall homelessness after increases occur.

With access to permanent housing constrained, more people remain unhoused for longer periods and spend extended time within homelessness-serving systems. This sustains pressure on services and increases costs over time.

Taken together, these trends indicate that homelessness in Ontario is not a temporary crisis. Instead, growth is being sustained by ongoing system conditions that affect how many people enter homelessness, how long they remain unhoused, and whether sufficient housing capacity exists to support exits at scale.

Key implications and direction.

PUBLIC SPENDING HAS GROWN, YET HOMELESSNESS CONTINUES TO RISE, INDICATING THAT EXISTING APPROACHES ARE NOT CONSISTENTLY TRANSLATING INTO IMPROVED OUTCOMES AT THE SCALE REQUIRED.

Much of the effort has focused on managing crises. This is necessary to address immediate harm, but it does not prevent or support timely access to affordable and appropriate housing. As a result, spending is often directed toward stabilizing conditions as needs arise, requiring increasing investment.

Homelessness does not occur within a single program, ministry, or level of government. It is shaped by how housing, healthcare, income supports, justice, child welfare, education, and other systems operate and interact over time. Outcomes depend on how these systems are designed, coordinated, sequenced, and governed across ministries and levels of government. Treating homelessness as an outcome produced across systems, rather than as a challenge to be managed within a single policy or program, is essential to reducing homelessness and limiting costs.

Because pressures move between systems, progress depends on a whole-of-government approach, rather than isolated action. Decisions made in one system can either increase or reduce homelessness pressures elsewhere. A coordinated, whole-of-government approach—operating horizontally across provincial services and mandates delivered through Service Managers, and vertically through federal, provincial, and municipal systems—helps ensure that effort in one area supports outcomes in another. This requires reconsidering how social spending is planned, targeted, and evaluated, based on outcomes across systems.

Yet, housing availability remains a central constraint. Increasing the supply of housing, particularly deeply affordable housing, is essential to reducing homelessness and requires an expanded federal role, alongside provincial and municipal action.

The previous *Municipalities Under Pressure* report modelled two investment approaches:

a longer-term investment of approximately \$11 billion

over 10 years to achieve functional zero chronic homelessness, including capital investment to substantially expand deeply affordable and supportive housing, alongside ongoing operating funding for prevention, housing stability, and supports; or

a targeted near-term investment of approximately \$2 billion

to reduce acute pressures such as encampments and stabilize conditions while longer-term housing supply is developed.²

THESE SOCIAL INFRASTRUCTURE INVESTMENTS REMAIN NEEDED TO IMPROVE STABILITY FOR INDIVIDUALS, FAMILIES, AND COMMUNITIES AND REDUCE HOMELESSNESS OVER THE MEDIUM AND LONG TERM.

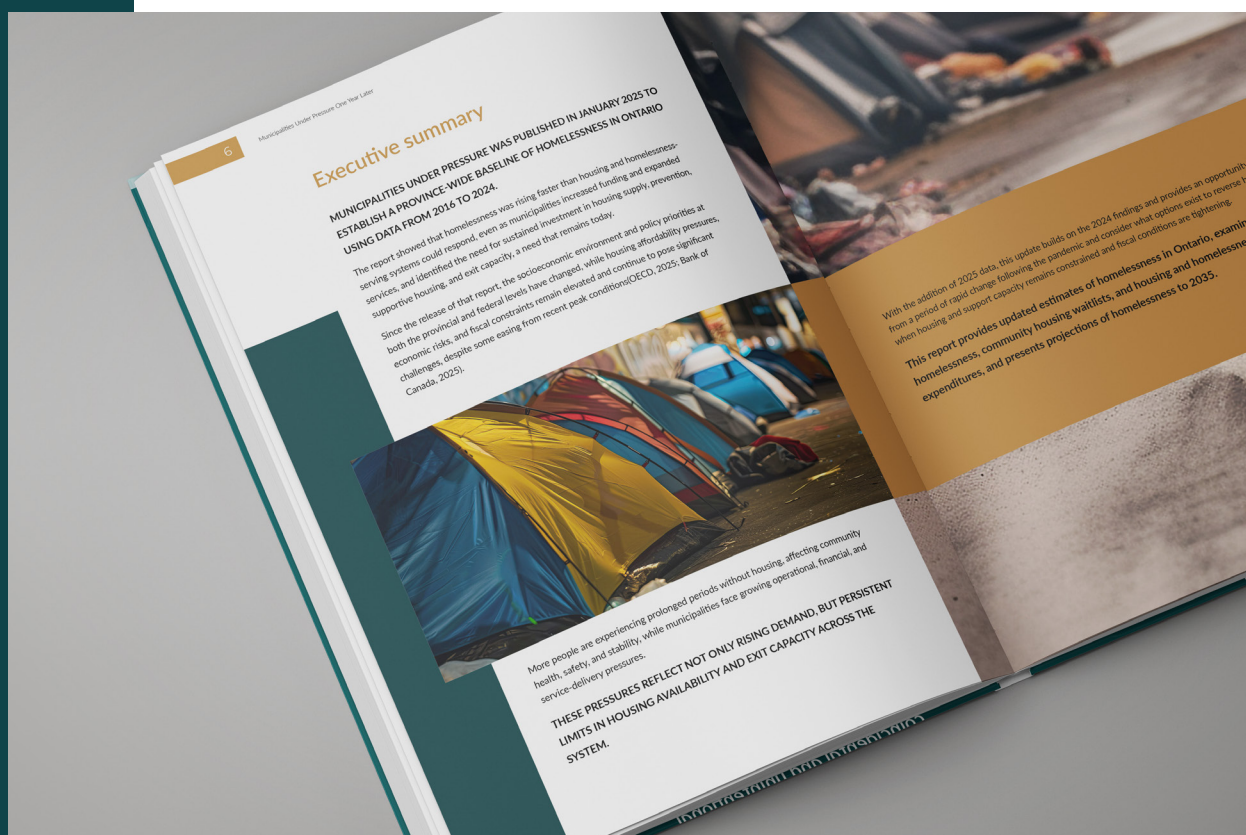
At the same time, given the projected growth in homelessness and the persistence of underlying drivers, housing investment alone will not be sufficient. To be effective, investments must be paired with better integration of policy, data, activities, outcomes, accountability, and decision-making across ministries, mandates, and levels of government.

2. Detailed estimates of the housing and support capacity required under the longer-term investment approach—including approximately 40,000 affordable housing units and 32,000 rent subsidies—are set out on page 100 of *Municipalities Under Pressure* (2025). Details of the targeted near-term investment to address acute pressures are set out on page 108

The integration [of housing, health, income, and social service systems across levels of government] is necessary to **ensure that housing investments translate into sustained reductions in homelessness**, do not shift pressures between systems, and support a response that remains sustainable over time.

Municipalities Under Pressure One Year Later:

An Update on the Human and Financial Cost of Ontario's Homelessness Crisis



This report is a joint project of the Association of Municipalities of Ontario, the Ontario Municipal Social Services Association, and the Northern Ontario Service Deliverers Association. It updates *Municipalities Under Pressure: The Human and Financial Cost of Ontario's Homelessness Crisis* (January 2025) using complete 2024 data and year-to-date 2025 information.

The original report documented a sharp rise in homelessness during and immediately following the pandemic, alongside rapid system expansion and increased public spending to manage rising need. This update uses more recent and complete data to assess how homelessness has continued to change since that period, and how homelessness-serving systems are functioning under current conditions.

Since the original report was released, housing affordability pressures have intensified, economic risks have increased, and fiscal constraints have become more pronounced across all levels of government.

At the same time, more people are remaining unhoused for longer periods, increasing pressure across housing, health, and social service systems and raising the human and financial costs associated with prolonged homelessness.

This report uses updated 2024–2025 data to examine current trends in homelessness, including changes in inflow, duration, spending, and capacity, as well as revised homelessness projections through 2035. Taken together, the findings indicate that higher levels of homelessness are continuing, despite increased spending within the system to address homelessness and, under current conditions, the homelessness trajectory is increasingly difficult to reverse.

1

People experiencing homelessness

This section presents updated estimates of people experiencing known homelessness in Ontario, using complete 2024 data and 2025 estimates based on annualized year-to-date information establishing the current scale and recent direction of change.

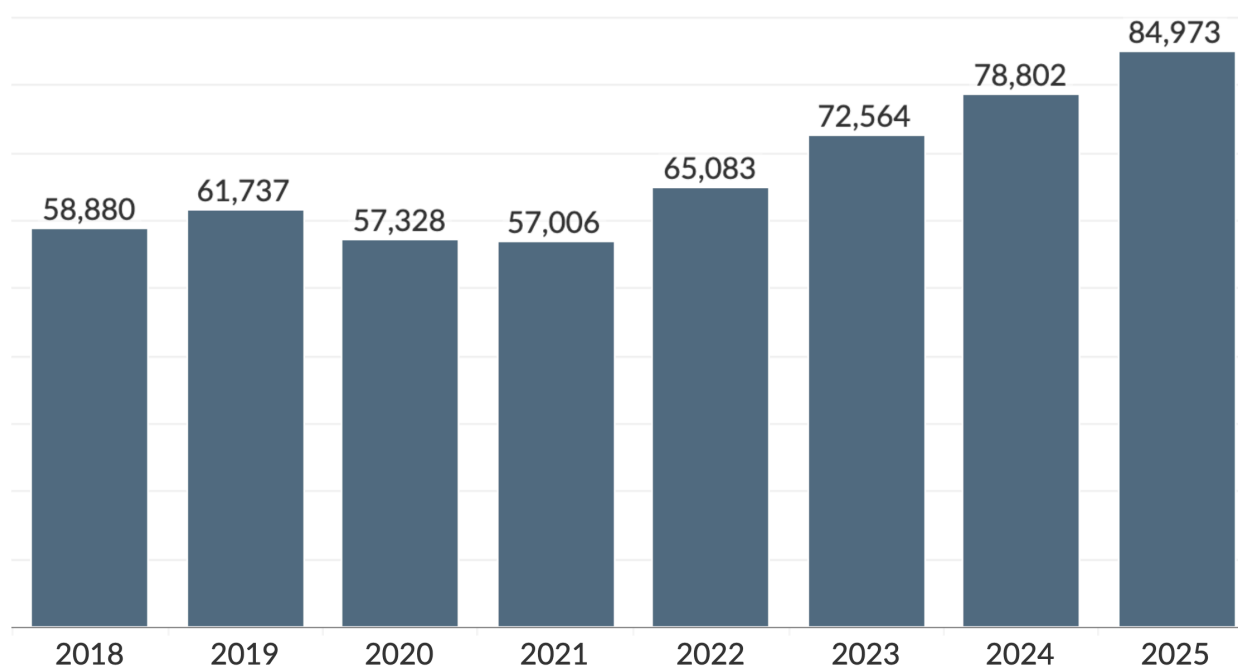
1.1 Known homelessness increased by 7.8% in Ontario in 2025.

In 2025, an estimated 84,973 people experienced known homelessness across Ontario. This represents an increase of 6,171 people from 2024, or 7.8%.

The 2025 *Municipalities Under Pressure* report estimated that 81,515 people would experience known homelessness by the end of 2024. With full-year 2024 data now available, the observed total was 78,802, a variance of 3.3% from the original estimate.

Taken together, the 2024 actuals and 2025 estimates show that the previous report's projection of an increase has occurred. Homelessness has risen year-over-year, across communities, and over multiple years, indicating a pattern that is persistent and growing.

Figure 1: Estimated number of people experiencing homelessness in Ontario, 2018–2025



Adjusted

Missing values have been filled using additional research or statistical methods.

Table 1: Service Manager (SM) submission rates Ontario, 2018-2024

	2018	2019	2020	2021	2022	2023	2024	2025
SM count	24	20	24	37	46	47	47	46
Population %	54%	63%	73%	85%	96%	100%	100%	99%

From 2016 to 2020, known homelessness increased gradually, rising from 53,930 to 57,328, an increase of approximately 6.3% over four years. Since 2021, the pattern has shifted. Over the same span of time, known homelessness has increased from 57,006 to 84,973, an increase of approximately 49.1%. While the year-over-year growth rate has declined since 2021, the total number of people experiencing homelessness has continued to rise each year.

Table 2: Year-over-year growth in known homelessness, Ontario, 2021–2025

Year	People experiencing known homelessness	Change from previous year	Percent change
2021	57,006	—	—
2022	65,083	+8,077	+14.2%
2023	72,564	+7,481	+11.5%
2024	78,802	+6,238	+8.6%
2025	84,973	+6,171	+7.8%

Although homelessness in Ontario is often described as a crisis—and undeniably is for individuals, families, and communities—the data in this section shows that it does not behave like a short-term shock. Growth has continued year after year, including under post-pandemic conditions, with crisis-response capacity expanding to keep pace with rising demand.

In practice, homelessness is not a temporary crisis. It has grown over time and is now a predictable, ongoing feature of the system. As a result, homelessness continues to be addressed through crisis responses (Gaetz & DeJ, 2017), because those are the tools most readily available to manage sustained demand.

1.2 Northern Ontario accounts for nearly 10% of homelessness in Ontario despite representing only 5% of the population.

In 2025, an estimated 8,142 people experienced homelessness in Northern Ontario, up from 5,930 in 2024, an increase of 37.3%.³

This increase represents a substantially higher rate of growth than in other parts of the province. Since 2021, homelessness in Northern Ontario has more than doubled, increasing by 117.5%, compared to 49.1% provincially over the same period. Northern Ontario now accounts for nearly 10% of all known homelessness in Ontario.

Figure 2: Estimated number of people experiencing homelessness in northern communities, Ontario, 2018–2025

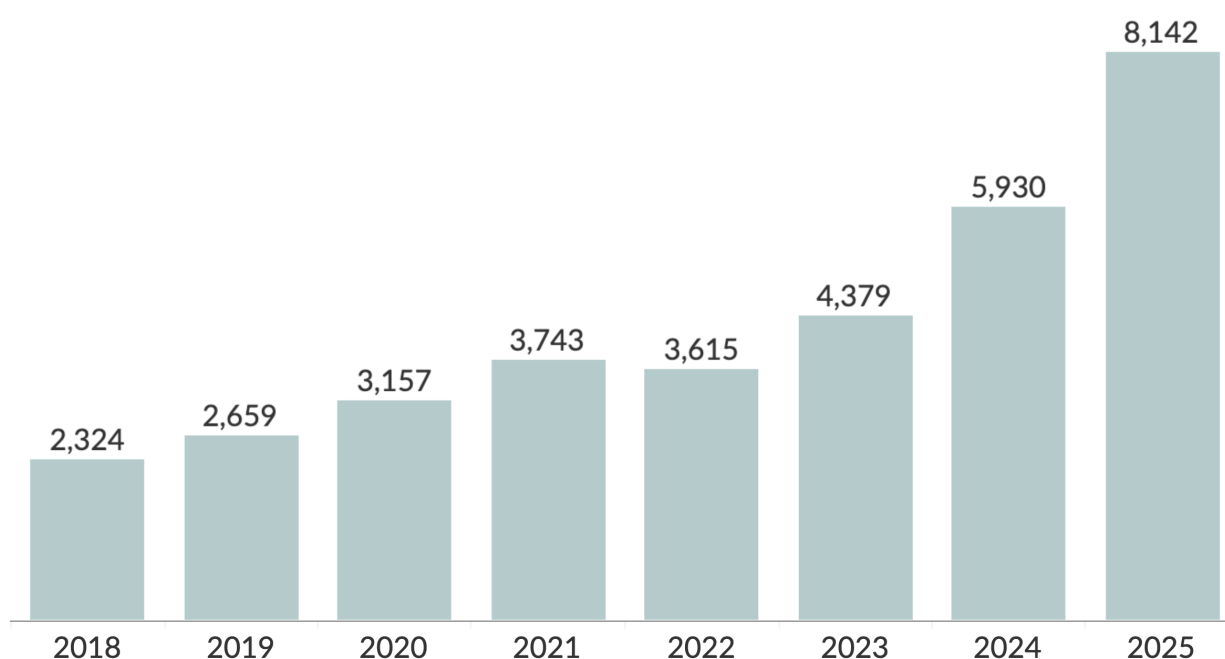


Table 3: Service Manager (SM) submission rates Ontario, 2018–2024

	2018	2019	2020	2021	2022	2023	2024	2025
SM count	6	3	5	8	11	11	11	11
Population %	37%	12%	37%	53%	100%	100%	100%	100%

3. Part of the year-over-year increase between 2024 and 2025 reflects improved data collection by one Northern Service Manager. However, even accounting for data improvements, homelessness in Northern Ontario has increased substantially over multiple years, indicating sustained growth rather than a one-time reporting effect.

In southern communities, existing housing and service infrastructure has absorbed rising demand to date, though it has been an increasing strain to do so. In Northern Ontario, where housing markets are tighter and service delivery is shaped by large geographic distance, smaller systems, and more limited infrastructure, including less access to provincially delivered services such as mental health and addictions supports, it has been impossible to absorb the increasing demand.

As factors driving homelessness persist, the Northern Ontario context illustrates how growing pressures on individuals, families, and communities may see the same situation occurring more widely across the province, something already apparent in rural areas.

1.3 Homelessness in communities that are mostly rural grew by 31.0% in 2025.

Homelessness in rural Ontario has grown more rapidly than in any other community type in the province. In 2025, an estimated 4,609 people experienced known homelessness in mostly rural Service Manager areas. Homelessness in the province increased by 7.8% overall from the previous year, while the increase was 31.0% in mostly rural communities and 15.1% in mixed rural-urban communities over the same period.

Figure 3: Estimated number of people experiencing homelessness in mostly rural communities, Ontario, 2018–2025

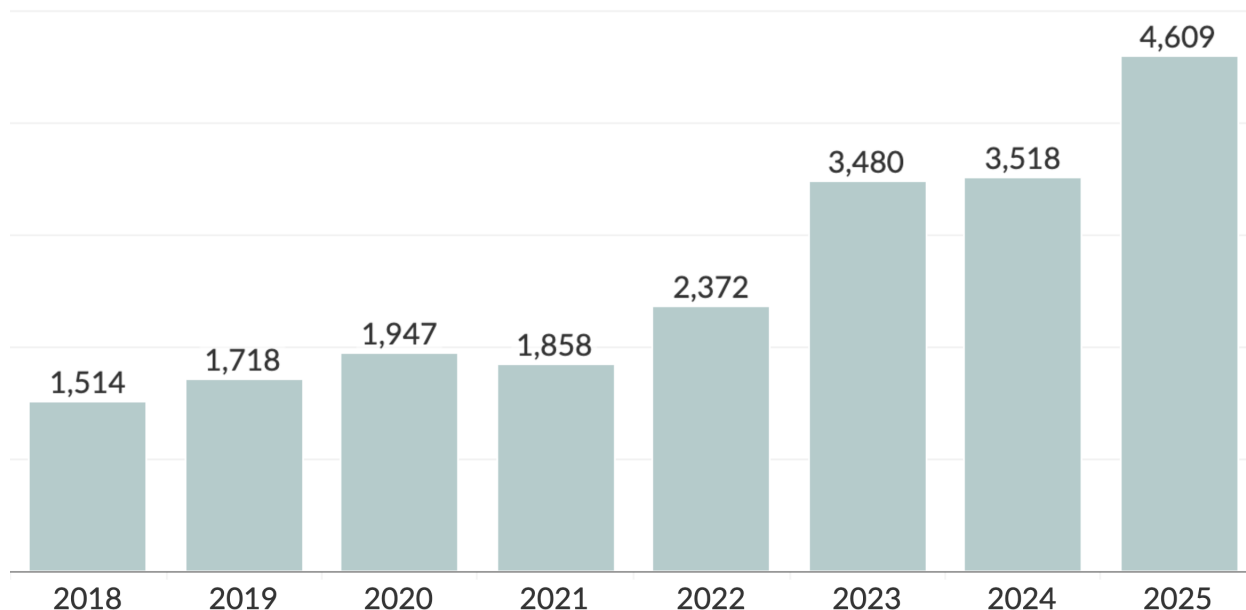
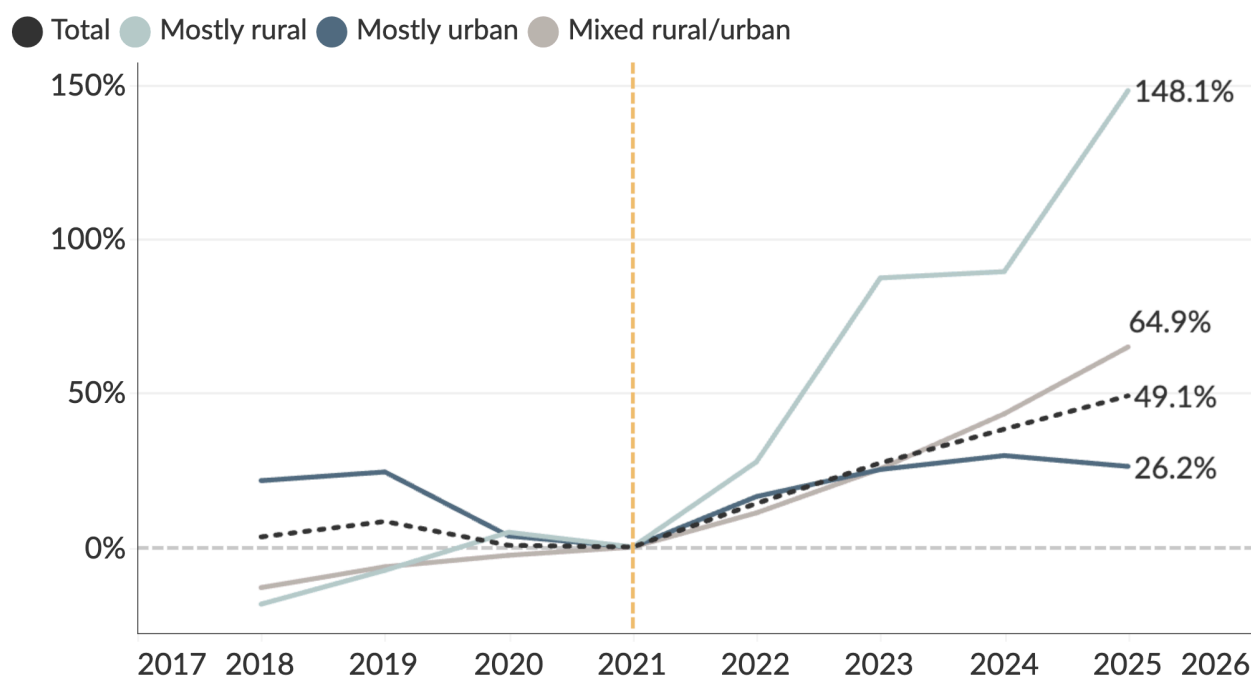


Table 4: Service Manager (SM) submission rates Ontario, 2018-2024

	2018	2019	2020	2021	2022	2023	2024	2025
SM count	11	8	8	12	15	15	15	15
Population %	76%	55%	58%	81%	100%	100%	100%	100%

Figure 4: Percent change in number of people experiencing homelessness from 2021, mostly rural, mixed rural-urban, and mostly urban communities, Ontario, 2018-2025



As noted in *Municipalities Under Pressure* (January 2025) and discussed further in section four of this report, municipalities across Ontario have increased their financial support for housing and homelessness programming in response to the rising need.

In mostly rural communities, lower population density and smaller tax bases limit the extent to which such support can be addressed through the property-tax levy alone. The financial pressures arise primarily as a result of the downloading of major assets and responsibilities to municipalities in the 1990s, a municipal challenge further exacerbated by severe funding constraints in rural areas.

Even though the province has increased support for rural municipalities through targeted infrastructure, operating, and development programs, rural municipalities remain more dependent on property tax revenue, which accounts for approximately 62% of total rural municipal revenues, compared to 54% in urban municipalities (ROMA, 2024).⁴

These figures reinforce the reality that the investment required to respond to sustained homelessness growth exceeds what municipal revenues can provide within the current system design. Even when provincially supported housing and homelessness funding streams are factored in, the system cannot keep up with demand.

4. Rural Ontario Municipal Association, based on analysis of 2023 Financial Information Returns, Government of Ontario.

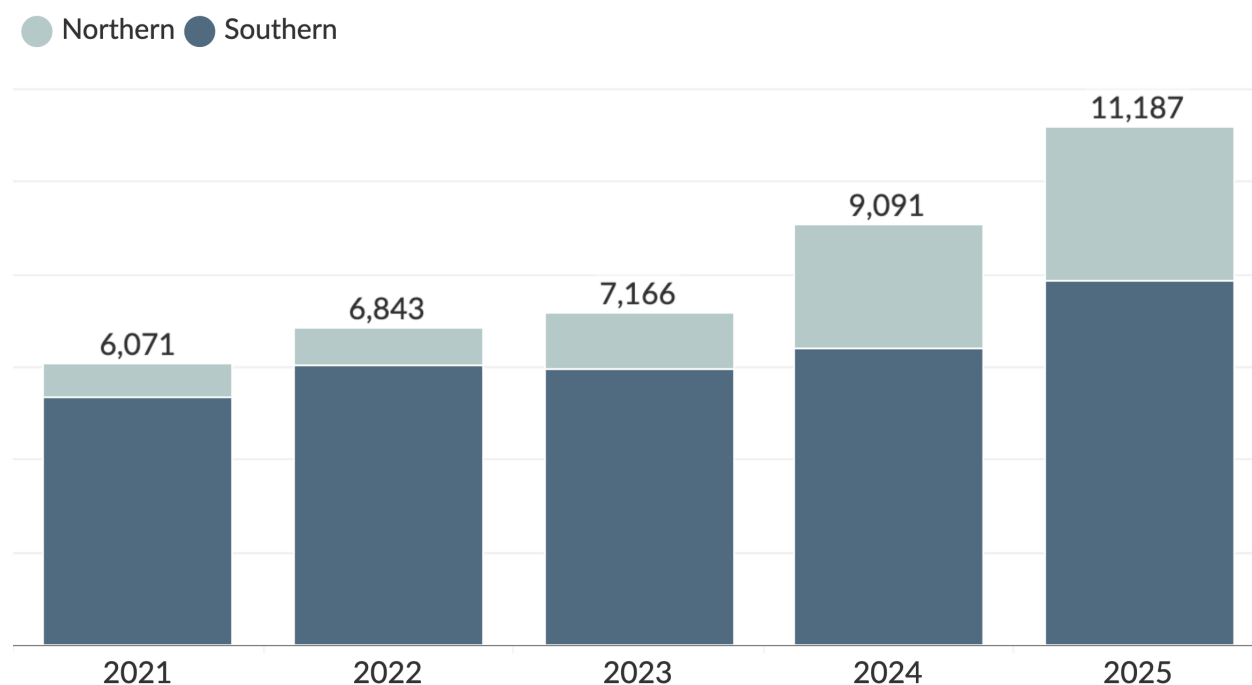
1.4 Service Manager–reported Indigenous homelessness increased by 23.0%.

Indigenous people are significantly overrepresented among those experiencing homelessness in Ontario. While Indigenous people represent approximately 2.9% of the provincial population, they account for an estimated 13.2% of people experiencing homelessness. In absolute terms, the number of Indigenous people experiencing homelessness has increased from approximately 6,100 in 2021 to over 11,000 in 2025, with the largest year-over-year increases occurring in 2024 (an increase of 26.8%) and 2025 (an increase of 23.0%). Part of this increase may reflect improved data collection across Service Managers.

In the north, Indigenous homelessness increased by 22.7% from 2024 to 2025. However, as documented in the 2025 report, Indigenous homelessness remains undercounted due to persistent structural barriers, including limited use of mainstream services, lack of culturally safe spaces, less likelihood of voluntary self-identification, and the exclusion of on-reserve homelessness from Service Manager reporting.

Over the same period, Indigenous representation as a proportion of total homelessness has remained relatively stable, fluctuating between roughly 11% and 13%. These trends indicate that, even if the percentage of Indigenous homelessness does not increase, as the number of people experiencing homelessness grows overall, Indigenous homelessness grows with it.

Figure 5: Estimated number of Indigenous people experiencing known homelessness, as reported by Service Managers, Ontario, 2021–2025



Adjusted

Missing values have been filled using additional research or statistical methods.

Table 5: Service Manager (SM) submission rates Ontario, 2021-2024

	2021	2022	2023	2024	2025
SM count	26	31	34	46	46
Population %	81%	87%	89%	100%	99%

Definitions of homelessness, funding arrangements, and service responsibilities across federal, provincial, and Indigenous governments have remained largely unchanged, even as demand has increased. As a result, responsibility for housing and support is often fragmented across systems, with no single pathway that consistently supports people to move out of homelessness.

For Indigenous people—particularly those moving between on-reserve and off-reserve systems—this fragmentation can interrupt access to housing, income supports, and services, contributing to longer periods of homelessness and higher rates of chronic homelessness (Infrastructure Canada, 2025).

2

Encampments and unsheltered homelessness

Encampments and unsheltered homelessness continue to be reported across most service areas in Ontario.

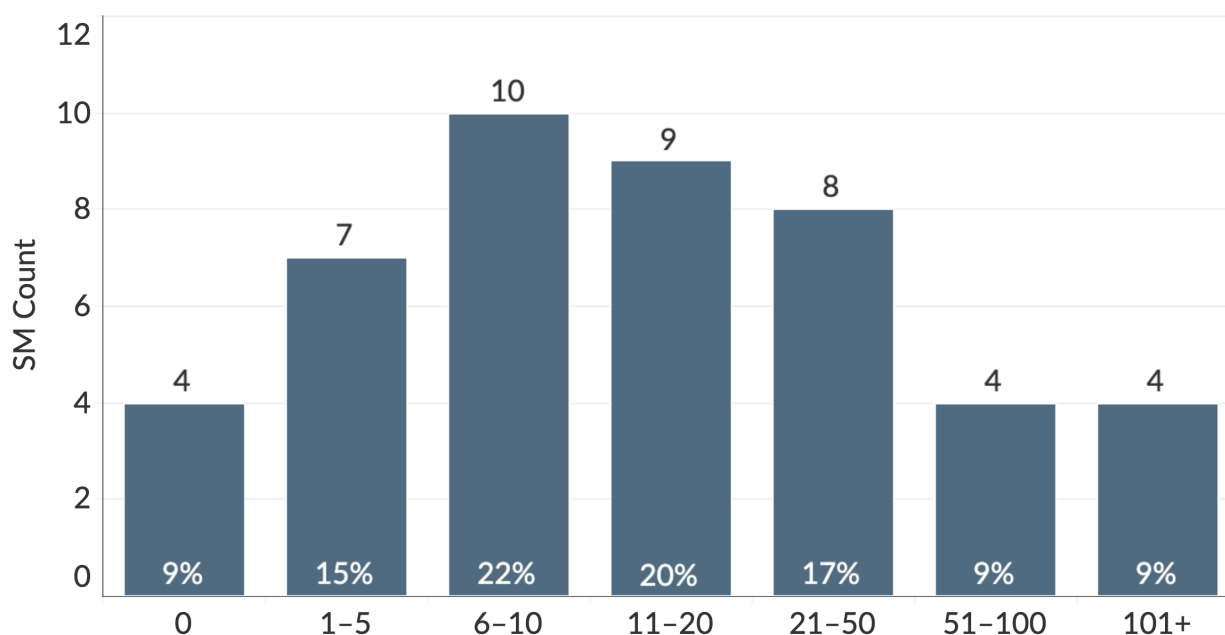
2.1 Service Managers report approximately 2,000 encampment sites across Ontario.

In 2025, Service Managers across Ontario reported an estimated 2,130 encampments, which were standardized to 1,944 site-based encampments after adjusting for differences in how encampments are defined and counted. Of 47 Service Managers, 42 reported at least one encampment. Reported counts range widely, from zero to more than 500 sites in individual jurisdictions; 74% of Service Managers reported fewer than 50 encampments in their area.

Encampments are predominantly small and dispersed, with 93% of Service Managers who reported at least one encampment saying the typical site involves between two and ten people. Large, centralized encampments are much less common. Several Service Managers reported increases in encampments in 2025, particularly for small, short-lived sites, rather than stable clusters.

Alongside encampments, Service Managers reported approximately 8,100 people experiencing unsheltered homelessness at a point in time.⁵ This includes people living in tents, vehicles, abandoned buildings, or other places not intended for habitation. As with encampments, unsheltered homelessness was reported across most service areas, with considerable geographic variation.

Figure 6: Number of encampments reported by Service Managers, Ontario, 2025

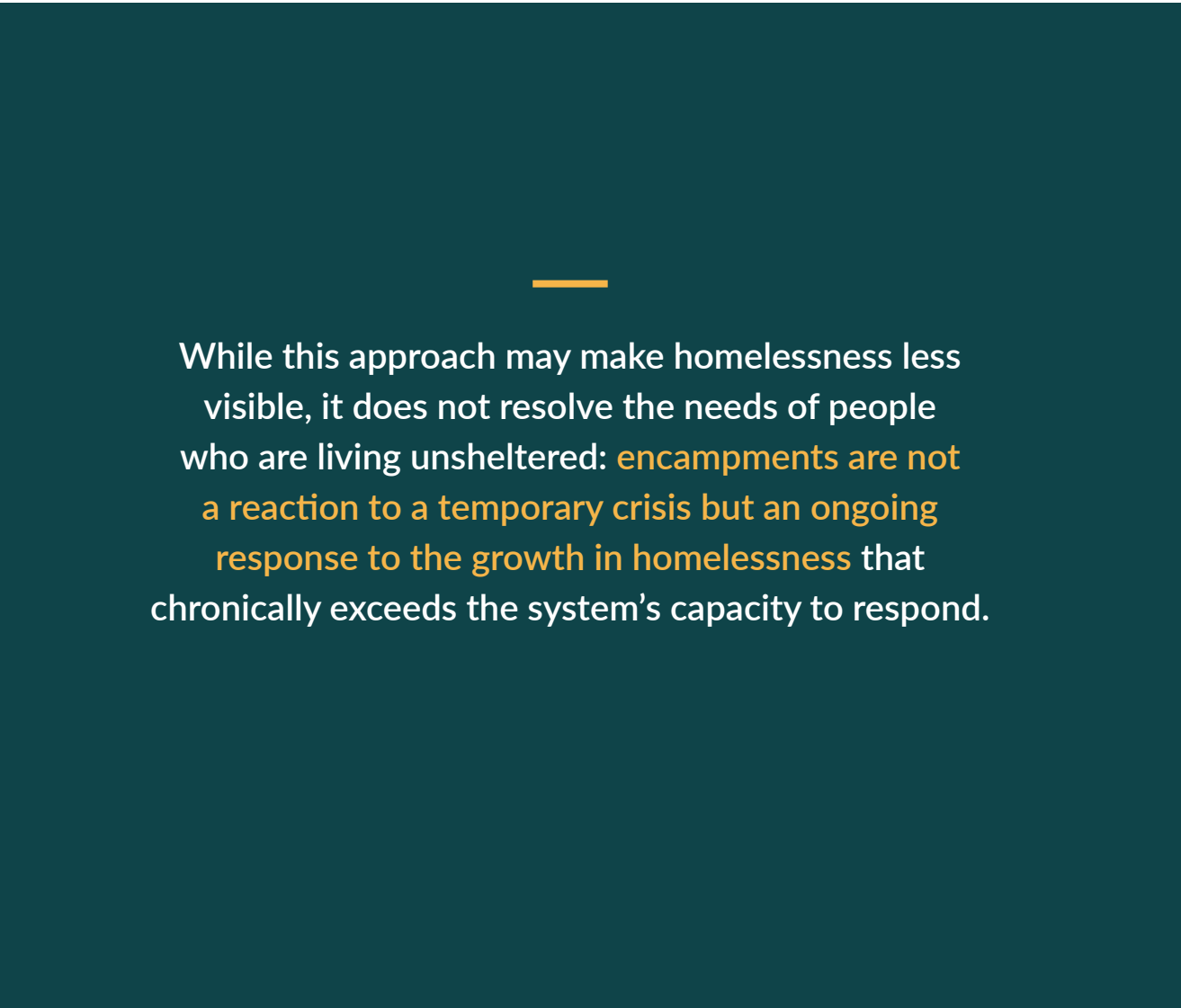


Recent provincial policy has addressed the visibility of encampments. The Safer Municipalities Act, 2025 (Bill 6) expands enforcement tools related to public drug use and public trespassing and defines tents on public land as public places, enabling police and municipal authorities to disperse encampments under specified conditions (Government of Ontario, 2025a). These measures respond to growing public concern about safety and disorder in shared spaces.

5. These figures differ from those gathered through coordinated Point-in-Time counts, which are conducted on a single reference night. Unsheltered homelessness counts reported here are drawn from a range of reporting periods and sources across Service Managers, and therefore do not represent single-night enumeration.

Several communities reported that encampments are smaller, which may be attributable to investments and policy decisions made by federal and provincial governments. At the same time, reporting by Service Managers indicates that enforcement activities primarily affect the location and visibility of encampments rather than resolving the issue. When encampments are dismantled, people often relocate to vehicles, more hidden locations, abandoned buildings, or smaller dispersed sites that are less visible and harder to track.

Taken together, the data indicates that enforcement is used increasingly to try to manage pressures that originate across multiple systems. When housing, shelter, and support capacities are limited, additional regulation of public spaces becomes part of addressing excess demand.



While this approach may make homelessness less visible, it does not resolve the needs of people who are living unsheltered: **encampments are not a reaction to a temporary crisis but an ongoing response to the growth in homelessness** that chronically exceeds the system's capacity to respond.



3

Inflow and outflow

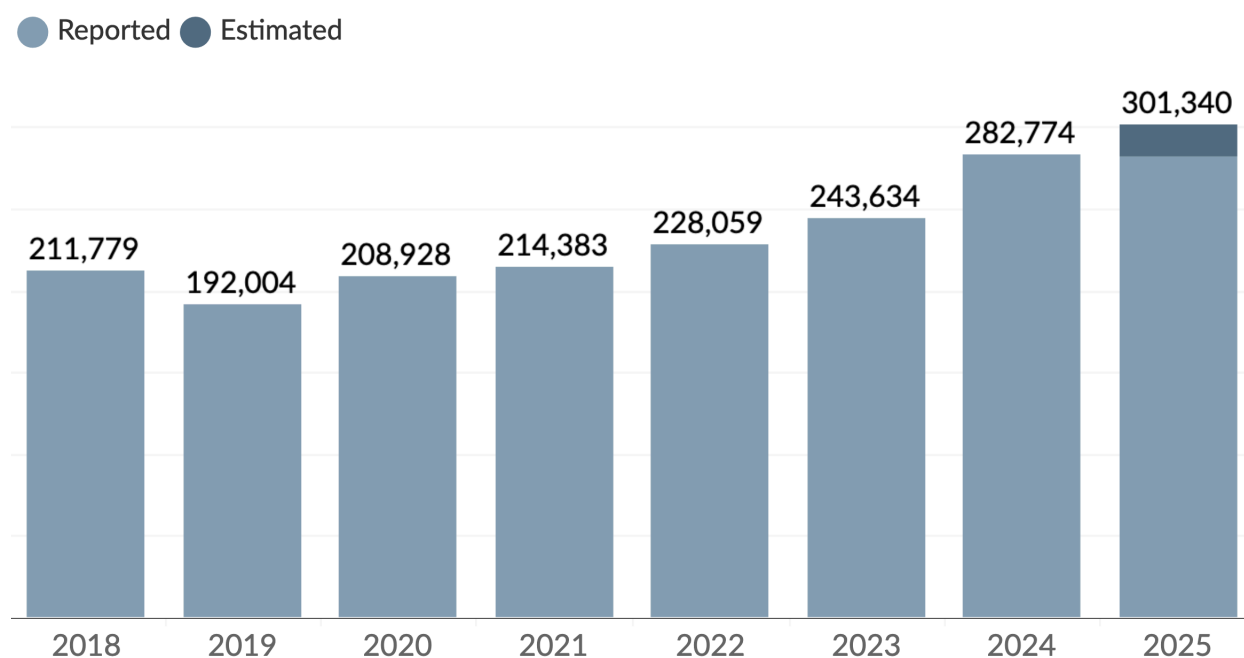
Homelessness increases when more people enter the system than can be supported to exit it, making it essential to examine the community housing waitlist, and the growing number of people remaining unhoused for longer periods.

3.1 The community housing waitlist now exceeds 300,000 households across Ontario.

In 2025, the rent-geared-to-income (RGI) waitlist in Ontario reached 301,340 households, an increase of 6.6% from 2024. The average wait time is now 65 months, or more than 5 years, with some households having waited 16 years.

The number of households on a waitlist is now 69% higher than the total supply of rent-geared-to-income units reported in 2024, which means the waitlist is growing faster than housing can be allocated (Donaldson, Wang, Escamilla, & Turner, 2025).

Figure 7: Households on waitlist for RGI, Ontario, 2018–2025



Adjusted

Missing values have been filled using additional research or statistical methods.

Table 6: Service Manager (SM) submission rates Ontario, 2018–2024

	2018	2019	2020	2021	2022	2023	2024	2025
SM count	39	40	41	41	41	43	47	46
Population %	90%	91%	95%	95%	95%	97%	100%	100%

The waitlist also indicates inflow pressure, since it shows households already experiencing homelessness as well as those at heightened risk of entering it. As the list grows, it shows that housing precarity is increasing at the same time that exit capacity remains limited.

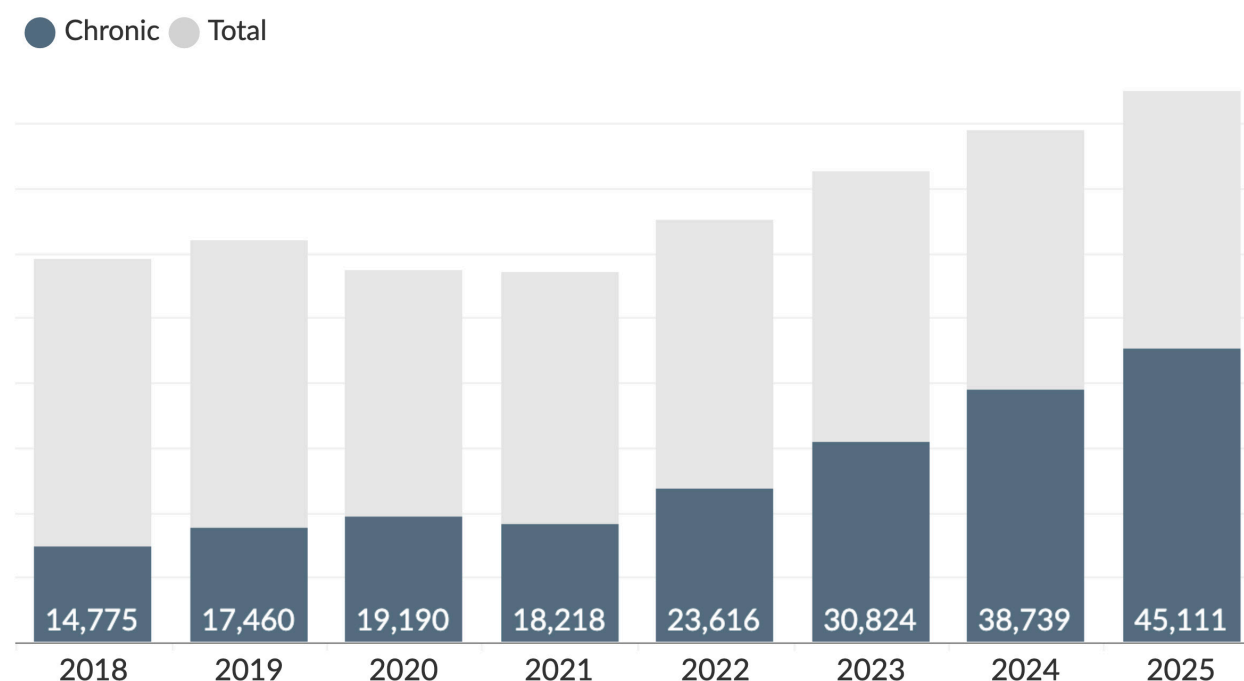
Socioeconomic conditions reinforce this imbalance. Income supports have not kept pace with housing costs, leaving many households unable to secure or maintain market housing without access to community housing (OECD, 2025). Rising food insecurity is another factor, with over one million Ontarians relying on food banks in 2024–25 and first-time food bank use increasing (Feed Ontario, 2025). Historically, homelessness rates grow within 12–18 months of increased food bank usage, suggesting that the recent increases in food bank usage means a likely continuation or even increase in people entering the homelessness system (Jadidzadeh & Kneebone, 2025)).

Taken together, the scale, growth, and duration of the community housing waitlist means the system is limited on both ends, creating conditions for persistent homelessness that will be increasingly difficult to reverse over time.

3.2 More than half of people experiencing homelessness remain unhoused long term.

In 2025, an estimated 45,111 people in Ontario were experiencing chronic homelessness, accounting for approximately 53% of all known homelessness. Chronic homelessness involves prolonged housing instability and extended interaction with homelessness-serving systems.

Figure 8: Estimated number of people experiencing chronic homelessness compared to total population experiencing homelessness, Ontario, 2018–2025 ⁶



Adjusted

Missing values have been filled using additional research or statistical methods.

6. The 2025 report estimated chronic homelessness in 2024 at 41,512; with updated full-year totals now available, the 2024 estimated count is 38,739.

Table 7: Service Manager (SM) submission rates Ontario, 2018-2024

	2018	2019	2020	2021	2022	2023	2024	2025
SM count	21	15	21	36	45	46	47	46
Population %	43%	51%	61%	81%	91%	95%	100%	99%

Rates of chronic homelessness are an indicator of how effectively the broader social safety net is supporting exits from homelessness under current conditions. Between 2021 and 2025, the number of people experiencing chronic homelessness more than doubled, rising from 18,218 to 45,111, while chronic homelessness as a proportion of all known homelessness increased from 32% to 53%.

A rising rate of chronic homelessness indicates that emergency responses are increasingly being used to manage ongoing demand for housing, with more people remaining unhoused for longer periods and cycling through shelters, encampments, and emergency or institutional settings.

When this pattern persists, costs and pressures are shifted to other public systems, including health care, justice, and emergency services, **extending the impact beyond the homelessness sector** (Mental Health Commission of Canada, 2014; Richard et al., 2024; Kouyoumdjian et al., 2019).

4

Spending

This section provides an updated overview of housing and homelessness funding using 2025 data. It reviews changes in overall investment since 2018 and examines how spending is allocated across program areas, offering context for how funding is being used to respond to the sustained pressures of homelessness.

4.1 Municipal contributions to housing and homelessness continue to increase.

Municipalities account for the largest and fastest-growing share of housing and homelessness funding in Ontario. Combined funding for housing and homelessness response is estimated to have reached over \$4.0 billion in 2025, more than double the \$2.1 billion reported in 2018. This represents an increase of 103.0% over the period, and 32.1% since 2021.

All levels of government increased their contributions. Federal funding rose from \$384 million in 2018 to \$950 million in 2025 (+147%). Provincial funding nearly doubled, from \$535 million to just over \$1.0 billion. Municipal funding increased from approximately \$1.1 billion to \$2.0 billion (+90%) and accounts for roughly half of all combined housing and homelessness funding.⁷

Figure 9: Funding trends for homelessness and housing programs by source, Ontario, 2018–2025

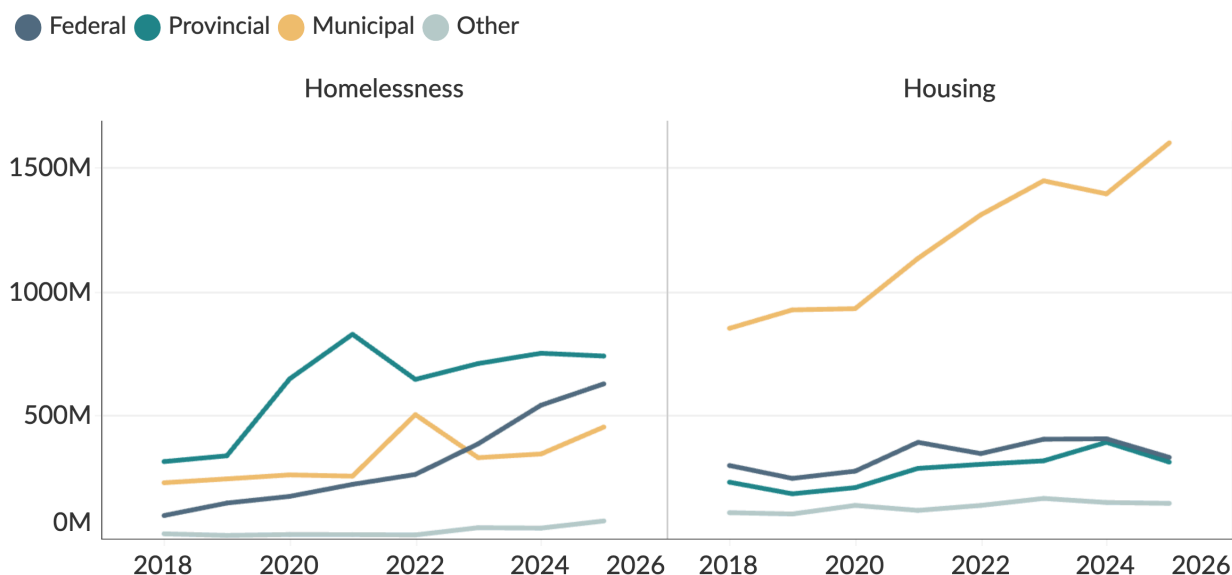


Table 8: Service Manager (SM) submission rates Ontario, 2018–2024

		2018	2019	2020	2021	2022	2023	2024	2025
Homelessness	SM count	38	39	42	44	44	47	47	47
	Population %	78%	79%	85%	88%	88%	100%	100%	100%
Housing	SM count	46	46	46	47	47	47	47	47
	Population %	80%	80%	80%	100%	100%	100%	100%	100%

7. Funding figures for 2024 in *Municipalities Under Pressure: The Human and Financial Cost of Ontario's Homelessness Crisis (2025)* reflected budgeted or estimated amounts, as the data collection period concluded in September prior to the end of the 2024 reporting year. Funding figures for 2024 in this update reflect reported full-year funding submitted by Service Managers. Differences between the two reports are attributable to the use of reported full-year data in this update.

Municipal governments are the primary funder of housing programs in Ontario, contributing approximately 67.4% of housing funding in 2025, while also providing nearly one-quarter of homelessness funding. In absolute terms, municipalities added approximately \$667 million in housing and homelessness funding between 2021 and 2025.

These figures reflect housing and homelessness funding reported through municipal Service Managers. However, they do not capture all homelessness-related costs incurred by municipalities. While Service Managers administer provincially funded housing and homelessness programs, all 444 municipalities incur additional expenses related to homelessness, including the provision of basic necessities, public safety and security, encampment management and clean-up, bylaw enforcement, and locally funded affordable-housing initiatives. As a result, total municipal exposure to homelessness-related costs is higher than what is reflected in Service Manager reporting alone.

Additionally, some provincial spending related to homelessness—such as Violence Against Women shelters and other provincially funded responses delivered outside the Service Manager system—is not captured in these figures.

Over the same period, homelessness continued to grow. Between 2021 and 2025, total funding increased by 32.1%, while the number of people experiencing homelessness increased by 49.1%. This indicates that financial investment and rising demand have expanded in parallel.

Homelessness growth is occurring alongside sustained and historically high levels of investment. While the data cannot indicate what homelessness levels would have been without this additional funding—particularly given rising inflow pressures, economic volatility, and constraints on housing availability—they do show that increased investment alone has not reversed the overall trajectory.

One such explanation may be the increase in chronic homelessness. As more people remain unhoused for longer periods, the cost of supporting each person increases. Longer shelter stays, repeated use of emergency and institutional services, and higher support needs raise per-person costs over time. As a result, increased funding can be absorbed by supporting fewer people for longer, rather than reducing homelessness overall.

4.2 Homelessness spending grew by 11% from 2024 to 2025, with emergency shelters and supportive housing accounting for most of that increase.

Spending on homelessness programs in Ontario increased from \$2.04 billion in 2024 to \$2.3 billion in 2025, an increase of \$229.9 million (11.3%).

The largest spending increases from 2024 to 2025 were for emergency shelters and supportive housing. Emergency-shelter spending increased from \$1.0 billion to \$1.1 billion, an increase of \$107.5 million (10.4%). This remained the single-largest area of homelessness spending.

Spending for supportive housing increased from \$540.8 million in 2024 to \$578.7 million in 2025, an increase of \$37.9 million (7.0%). While that year-over-year growth rate slowed compared to earlier years, supportive housing continued to represent a substantial and growing proportion of total homelessness spending, accounting for 25.5% in 2025.

Other program areas also had continued growth between 2024 and 2025. Spending on transitional housing increased from \$143.2 million to \$180.6 million, an increase of \$37.4 million (26.1%), while community outreach spending rose from \$87.1 million to \$134.6 million, an increase of \$47.5 million (54.5%). By contrast, spending on prevention and diversion declined from \$98.5 million to \$88.3 million, a decrease of \$10.2 million (10.4%).

Table 9: Homelessness program spending by program type, Ontario, 2021–2025

		2021	2022	2023	2024	2025
Emergency shelters	Expenditures	750.8M	820.1M	966.5M	1,030.4M	1,137.9M
	% of total	62.2%	64.2%	66.7%	50.5%	50.1%
	SM average	\$18,771K	\$19,073K	\$21,478K	\$21,923K	\$24,211K
	SM count	40	43	45	47	47
	Population %	86%	87%	95%	100%	100%
Transitional housing	Expenditures	64.6M	80.9M	90.0M	143.2M	180.6M
	% of total	5.4%	6.3%	6.2%	7.0%	8.0%
	SM average	\$2,810K	\$3,677K	\$3,599K	\$3,047K	\$3,843K
	SM count	23	22	25	47	47
	Population %	66%	52%	70%	100%	100%
Supportive housing	Expenditures	147.4M	163.5M	144.4M	540.8M	578.7M
	% of total	12.2%	12.8%	10.0%	26.5%	25.5%
	SM average	\$4,912K	\$4,673K	\$3,904K	\$11,507K	\$12,312K
	SM count	30	35	37	47	47
	Population %	61%	65%	73%	100%	100%
Caseload support services	Expenditures	26.4M	19.8M	22.8M	39.1M	45.7M
	% of total	2.2%	1.6%	1.6%	1.9%	2.0%
	SM average	\$1,054K	\$861K	\$948K	\$832K	\$973K
	SM count	25	23	24	47	47
	Population %	61%	57%	64%	100%	100%
Prevention and diversion	Expenditures	68.3M	83.7M	81.0M	98.5M	88.3M
	% of total	5.7%	6.6%	5.6%	4.8%	3.9%
	SM average	\$1,665K	\$2,092K	\$1,928K	\$2,097K	\$1,879K
	SM count	41	40	42	47	47
	Population %	67%	63%	71%	100%	100%

Community outreach	Expenditures	23.4M	35.7M	60.5M	87.1M	134.6M
	% of total	1.9%	2.8%	4.2%	4.3%	5.9%
	SM average	\$938K	\$1,021K	\$1,552K	\$1,853K	\$2,864K
	SM count	25	35	39	47	47
	Population %	59%	82%	91%	100%	100%
Other services and supports	Expenditures	126.5M	72.9M	83.3M	100.8M	104.1M
	% of total	10.5%	5.7%	5.8%	4.9%	4.6%
	SM average	\$3,163K	\$1,823K	\$2,083K	\$2,145K	\$2,214K
	SM count	40	40	40	47	47
	Population %	86%	85%	92%	100%	100%
Total	Expenditures	1,207.4M	1,276.7M	1,448.5M	2,040.0M	2,269.9M
	% of total	100.0%	100.0%	100.0%	100.0%	100.0%
	SM average	\$5,390K	\$5,364K	\$5,748K	\$6,200K	\$6,899K
	SM count	43	44	46	47	47
	Population %	87%	88%	96%	100%	100%

Housing program spending also increased in 2025. Total housing spending rose from \$2.31 billion in 2024 to \$2.7 billion in 2025, an increase of \$422.4million (18.3%). Growth was concentrated in rent supplements and housing allowances (+\$102.3 million), market rent housing (+\$61.3 million), and other housing programs (+\$162.8 million).

In a longer-term context, homelessness spending increased from \$1.21 billion in 2021 to \$2.27 billion in 2025, an increase of \$1.06 billion (88.0%). Over this period, supportive housing accounted for the largest absolute increase for any homelessness program area, rising by \$431.3 million, while emergency shelter spending increased by \$387.1 million. Together, these two areas accounted for most of the growth in homelessness spending.

Increased investment in supportive housing is necessary. Growth in spending for this program area recognizes its importance within the homelessness response and the growing number of people experiencing homelessness who have complex needs around mental health, substance use, and physical health. Many of these needs emerge or intensify over time, shaped by prolonged experiences of homelessness and limited access to timely housing, healthcare, and treatment earlier in people's pathways into homelessness (Gaetz & Dej, 2017).

Recent provincial investments, including the establishment of Homelessness and Addiction Recovery Treatment (HART) hubs, reflect growing recognition of the close connection between homelessness, mental health, and substance use.

At the same time, the continued year-over-year growth in spending on emergency shelter and supportive housing shows that demands on the system are driven by increasingly complex needs. This pattern demonstrates that pressure is building at the intensive end of the system, driving more investment in responses to crisis and long-term high support, rather than reducing the flow of people before they reach that level of need.

5

Future homelessness

This section presents updated projections of future homelessness in Ontario, using the most recent data available and projections that illustrate how homelessness is expected to change under different economic and policy conditions.

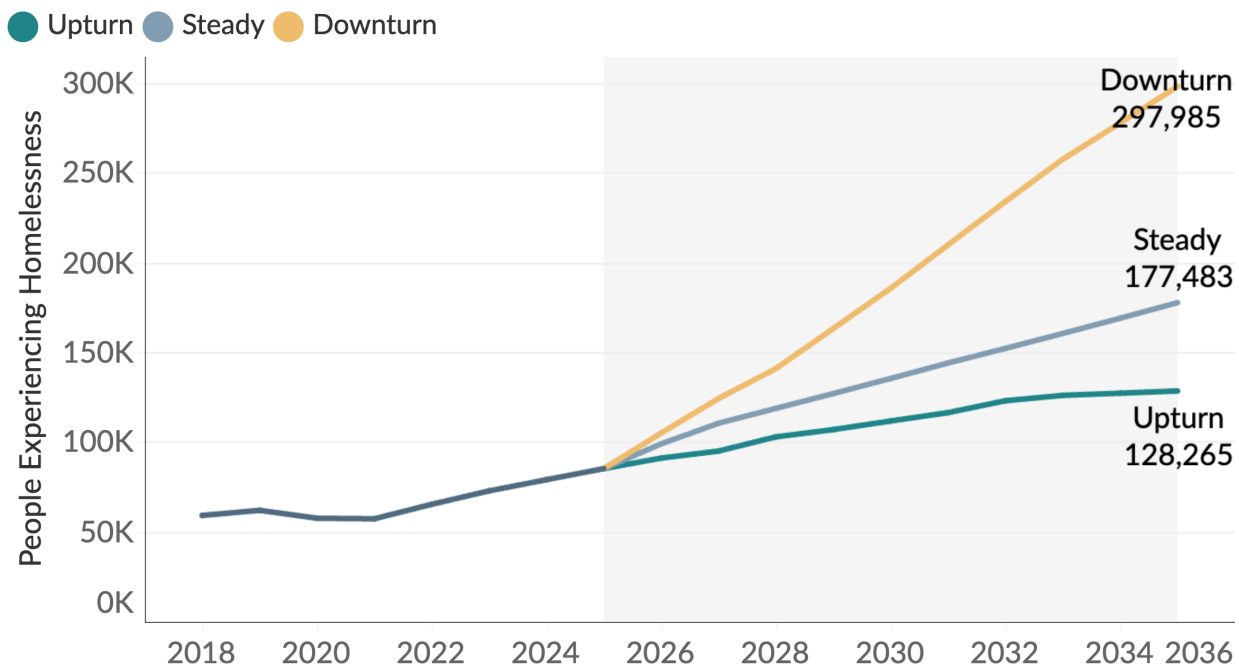
5.1 Over 170,000 people may be experiencing homelessness by 2035.

Homelessness in Ontario is projected to increase substantially through 2035, under all modelled conditions. The projections in this update are generated using the same model structure and core drivers applied in the January 2025 *Municipalities Under Pressure* report, including labour-market conditions, income, housing affordability, population change, and core housing need. What differs in this update are the assumptions applied to those drivers, reflecting the current economic and policy environments, which have changed. Additional detail on model structure and assumptions is provided in the technical appendix.

Under an economic upturn, homelessness is projected to reach approximately 128,265 people by 2035. Under steady conditions, the projection rises to 177,483, while under an economic downturn, the number reaches approximately 297,985.

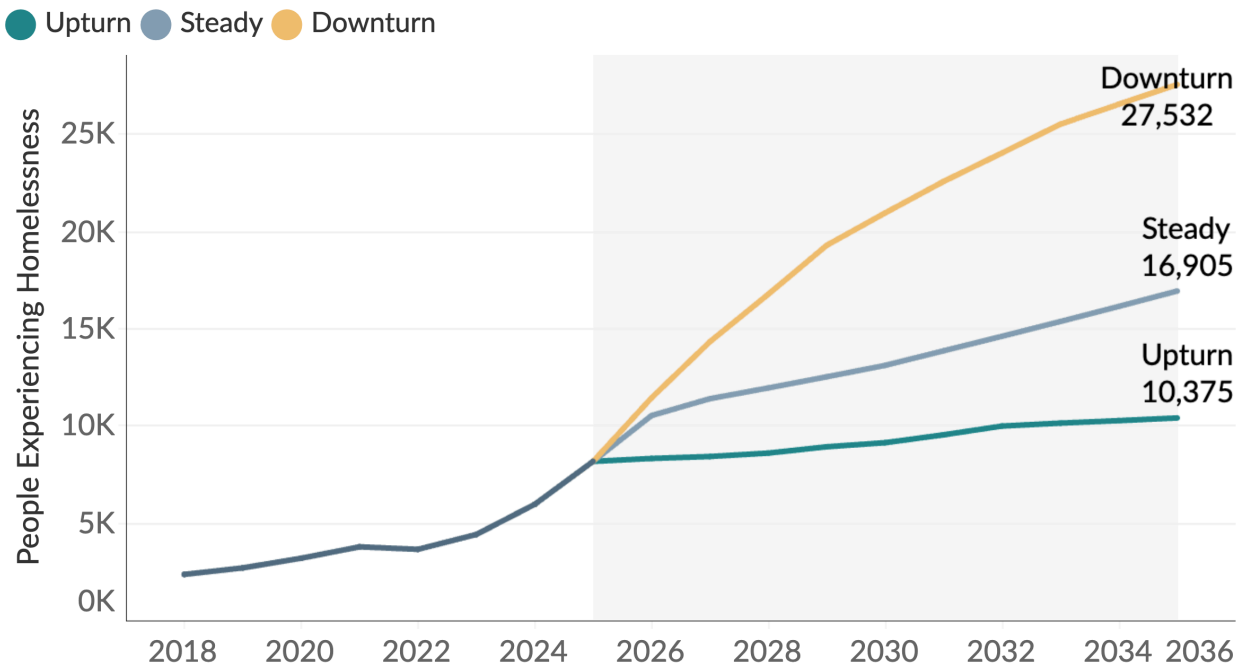
In each scenario, homelessness continues to increase rather than stabilizing or declining, even under improved economic conditions. Homelessness by 2035 is projected to more than double under the steady scenario and more than triple under the downturn scenario.

Figure 10: Projected homelessness under three socioeconomic scenarios, Ontario, 2025–2035



In Northern Ontario, homelessness is projected to rise by 2035 to approximately 10,375 under an upturn, 16,905 under steady conditions, and 27,532 under a downturn. In Southern Ontario, increases in projected homelessness account for the majority of provincial growth in absolute numbers across all scenarios, reflecting larger populations and ongoing affordability pressures.

Figure 11: Projected homelessness under three socio-economic scenarios, Northern Ontario, 2025–2035



The updated assumptions reflect more severe and prolonged economic shock than was projected in earlier downturn scenarios. Emerging risks—including United States trade tariffs, weakening global demand, and new domestic policy restrictions affecting immigration—are assumed to place deeper and longer-lasting strain on Ontario's economy. Under these conditions, unemployment rises faster and remains elevated for longer, immigration declines more sharply, and core housing need accelerates as incomes stagnate and the cost of living continues to rise.

Recent economic indicators suggest this added pressure is already starting to occur. Ontario's real GDP contracted 0.6% in the second quarter of 2025, marking the first quarterly decline other than during the pandemic in nine years, driven in part by the effects of the United States tariffs on manufacturing and exports (Government of Ontario, 2025).

The Financial Accountability Office projects 68,100 fewer jobs in 2025 and 119,200 fewer jobs in 2026 under current trade conditions (Financial Accountability Office of Ontario, 2025). Labour-market disruption is closely linked to homelessness through income instability. Job loss and insufficient income are leading factors in housing loss, with 37% of respondents citing insufficient income as the primary reason for their most recent episode—up from 28% in 2020–2022 (Housing, Infrastructure and Communities Canada, 2025).

5.2 Homelessness in Ontario is not a temporary crisis.

The projections in Section 5.1 show homelessness continuing to increase through 2035 under all modelled conditions, including scenarios that assume economic improvement. This premise builds on a longstanding and substantial level of homelessness that existed before the pandemic. That was followed by a sharp increase beginning around 2021, with no subsequent return to earlier levels. While the increase in homelessness has moderated since 2021, there continues to be an upward trajectory.

It is clear that this pattern of increasing homelessness is not a temporary crisis. Though we are at risk of the situation becoming intractable, there are things we can do to change the current trajectory. In considering rates of homelessness over the past nine years, we can see that, prior to 2021, homelessness levels were relatively stable, though still high, reflecting persistent underlying pressures. That these pressures have not been resolved is evident from continued increases: despite larger investments, the homelessness system has not been able to reduce homelessness overall.

Recent trends support this conclusion. Between 2024 and 2025, both homelessness and homelessness-related spending continued to increase: as people remain unhoused for longer periods and access to permanent housing remains limited, more people stay within the system for longer. This increases pressure on services and increases costs over time.

As a result, investment and system response are increasingly directed toward managing higher levels of demand, rather than reducing homelessness back to earlier levels. Emergency shelters, supportive housing, and other high-intensity responses have expanded to meet growing need, meaning spending is reacting to demand rather than reducing it.

In these circumstances, it is not feasible for any single level of government or homelessness-related program, under the current system design, to produce sustained reductions in homelessness.

It is important to note that the economic-scenario projections assume that current funding levels will be maintained in an increasingly constrained fiscal environment, but should existing federal housing investments, including the National Housing Strategy, be reduced or suspended, projected homelessness may increase substantially.

6

Moving forward

The findings in this report indicate that reversing the growth of homelessness will require both substantial housing investment and changes in how systems operate together.

The previous *Municipalities Under Pressure* report modelled the scale of investment required to change the trajectory of homelessness, assuming improved coordination and performance across the broader social safety net. That modelling identified two investment approaches:

- a longer-term investment of approximately \$11 billion over 10 years to substantially expand deeply affordable and supportive housing, alongside ongoing operating funding for prevention, housing stability, and supports; or
- a targeted near-term investment of approximately \$2 billion to address acute pressures such as encampments and visible unsheltered homelessness, intended to reduce immediate harm and slow further system strain while longer-term housing supply is developed.

These investment estimates have not been re-modelled in this update, as they continue to reflect the scale of housing and social infrastructure required to improve outcomes under current conditions.

At the same time, this report shows that homelessness has continued to increase despite growing investment and expanded system activity. This pattern suggests that decisions made within the homelessness-serving system alone, while necessary and reflective of sustained effort, have not been sufficient to reverse overall homelessness. The findings point to the importance of examining how conditions across the broader social safety net interact over time, particularly under sustained pressure.

Historically, responses to homelessness have focused primarily on managing immediate need rather than preventing housing instability earlier. What is required is a more coordinated approach that addresses the conditions associated with homelessness, with clearer alignment of policy, funding, service delivery, and accountability across housing availability, income supports, healthcare, mental-health and substance-use services, the justice system, and other related systems.

This section describes what is required to support that shift in approach.

6.1 Slowing the rate of homelessness requires each government, across departments, and all levels of government, to work together in a coordinated approach.

Improving outcomes across Ontario's social safety net requires actively integrating how social policy, funding, and service delivery operate across housing, healthcare, income supports, justice, child welfare, education, and related systems. These systems serve the same people over time and need to work together to effectively serve the population's needs.

When systems plan and deliver programs in isolation, there are gaps, duplications, and inefficiencies, even when individual programs are performing as intended. Over time, this leads to income insecurity, higher use of emergency healthcare, involvement with the justice system, and homelessness.

But homelessness rarely comes first. Integrating the social safety net to improve outcomes earlier and more broadly, rather than addressing any single issue in isolation, will help support a greater focus on homelessness prevention.

A whole-of-government approach means strategically aligning systems to work together, so that public policy and service delivery support stability earlier, reduce the cycle of repeated system use, and improve outcomes across people's lifetime. Expected benefits will go beyond reducing homelessness, to include improved health outcomes, more stable income-support transitions, reduced reliance on emergency services, and improved overall use of public resources.

This approach requires governments working together. Housing supply and immigration policy are shaped in part by federal decisions. Healthcare, income supports, and system design are administered provincially. Housing and homelessness services are delivered municipally through Service Managers. Better outcomes depend on how these various government programs interact.

In practical terms, this integration requires alignment in:

- Data, so people can be followed across systems over time.
- Activities, so services connect at key transition points.
- Funding, so public resources reinforce shared outcomes rather than shifting costs to one another.
- Outcomes and accountability, so responsibility for system performance is visible across each government's departments and all levels of government.

The province is uniquely positioned to lead integration across the social safety net, given its role in setting social policy, administering major service systems, and managing the largest share of social spending.

6.2 A shared data infrastructure is required to understand people, outcomes, and costs.

A whole-of-government approach depends on seeing how people access various systems over time. The province holds extensive administrative data across the social safety net, while Service Managers hold detailed information on housing, homelessness, income supports, and related community services. In most cases, these datasets remain separate.

Linking data across systems makes it possible to identify where instability begins, how long it lasts, and how people move between programs. Such linkages also allow governments to see patterns of repeated system use, prolonged and recurrent homelessness, and delayed exits.

This approach makes the most of funding limited by fiscal constraints, allowing governments to see whether public spending is improving outcomes.

6.3 Identifying persistent, cross-system needs will improve outcomes and manage cost.

When data is connected across systems, it becomes possible to identify people whose needs are being addressed repeatedly rather than being resolved. This is important, because such situations account for a disproportionate amount of public spending. Cross-system connections can help ensure that responses to those needs are timely and in the right sequence.

6.4 Activities across systems must be aligned at key transition points.

Adverse outcomes, including homelessness, frequently occur at predictable transition points, such as hospital discharge, justice involvement, loss of income, housing instability, or ageing out of care. These situations are shaped by eligibility rules, funding arrangements, and operational practice across multiple systems.

Aligning programs and early coordination at these points prevents people from falling into gaps between systems and improves outcomes over time.

6.5 Public spending should be traceable across systems and outcomes.

Public spending on essential services—including housing, healthcare, income supports, justice, and emergency services—is largely planned within individual programs under the direction of individual ministries. But, over time, the programs are serving the same people.

The response to homelessness illustrates this. People experiencing homelessness often interact with multiple systems, either all at once or sequentially. Each system may be acting as effectively as possible within its mandate, yet the total spending may still fail to help people achieve and sustain permanent housing. Overall costs may often be higher in a fragmented system while outcomes may be poorer.

Housing supply is a critical constraint on these outcomes. Federal investment is required to finance the construction of deeply affordable and social housing at the levels required. Recent initiatives, including Build Canada Homes, represent an important step in this direction (Government of Canada, 2024). However, without sustained capital investment at sufficient scale—aligned with provincial system design and municipal funding and delivery—new supply will continue to be absorbed into an already strained system without producing durable housing exits or changing overall outcomes.

Making public spending traceable across systems allows governments to understand how housing investment interacts with spending in other areas, identify inefficiencies, and assess whether resources are reducing homelessness through improved exit outcomes or unintentionally sustaining it by trying to manage chronic homelessness through crisis services. This visibility is essential for aligning housing investment with changes elsewhere in the social safety net, so that public spending produces lasting housing stability rather than managing persistent instability.

6.6 Accountability for outcomes should extend across ministries and governments.

Reducing homelessness depends on whether public spending across systems results in people securing and keeping stable, long-term housing. Stabilizing costs over time requires better outcomes, including shorter periods of homelessness, fewer returns into homelessness, and greater housing stability.

People's needs are shaped over time by multiple systems, including housing, income support, healthcare, and justice. But since accountability remains largely organized within individual programs and ministries, it becomes difficult to see whether people are achieving stable outcomes or whether costs and pressures are simply being moved from one system to another.

With fiscal constraints, cross-system accountability becomes even more important, allowing governments to distinguish between cost containment resulting from improved performance and cost reductions based on delays in serving needs or shifting the pressure to other programs and systems.

Accountability should be tied to shared, system-level targets, rather than program-specific measures. These targets should focus on outcomes that matter across systems, including reducing avoidable use of emergency services, shortening the time people remain homeless, improving housing stability, and reducing reliance on high-cost crisis responses.

6.7 Acting earlier is essential to managing cost and improving outcomes.

Improving how systems work together does not reduce the need for housing investment. It determines whether that investment leads to greater stability or is quickly overwhelmed by continued homelessness. Delays in addressing housing availability and related system pressures increase costs across housing, healthcare, income supports, and emergency services.

If current trends continue, pressures across housing, healthcare, income supports, and emergency services will intensify and become increasingly difficult to manage. Homelessness is projected to continue increasing through to 2035, and many communities are already experiencing these effects.

Acting earlier creates an opportunity to change course. This includes not only investing in housing sooner, but also addressing how other systems contribute to housing instability and homelessness. Earlier action can reduce the number of people entering homelessness, shorten the time people remain unhoused, and limit the accumulation of costs across multiple systems.

In a fiscally constrained environment with sustained growth in need, the central challenge is to act early enough, and in a coordinated way, so that public spending supports individual, family, and community wellbeing rather than managing ongoing instability. This requires combining necessary housing investment with changes in how policy, funding, service delivery, and accountability operate across the broader social safety net.

Conclusion

Ontario's current discussions around policy emphasize protecting the province from external economic threats, including trade disruption, tariffs, and global instability. The findings of this report demonstrate that Ontario is also dealing with growing internal pressure that warrants the same sort of forward-looking approach. Homelessness is now a predictable, modelled outcome under current conditions. Its persistence is shaped by an increase in chronic homelessness, limited options to exit homelessness, and increasing interactions with health, justice, and emergency systems.

In *Municipalities Under Pressure* (2025), the investment required to change this trajectory was estimated at approximately \$2 billion to address acute pressures, such as encampments, in the near term, and up to \$11 billion over 10 years to achieve functional zero chronic homelessness through expanded housing and supports (Donaldson, Wang, Escamilla, & Turner, 2025). We stand behind that assessment in this updated report.

These investments are required to expand deeply affordable and supportive housing, transitional housing, emergency infrastructure where it does not exist, and effective mental-health and substance-use treatment. Additional investment in broader affordable-housing construction is also necessary to reduce first-time homelessness and to support economic activity during a period of trade disruption. Preserving existing federal housing investments, including the continuation of the National Housing Strategy, remains critical.

Recent federal initiatives, including Build Canada Homes, represent a meaningful step toward an improved deeply affordable housing supply. To improve homelessness outcomes, these capital investments must be sustained and aligned with provincial-system design and municipal delivery.

Even with these investments and initiatives underway, over the last four years, combined housing and homelessness funding has increased by approximately 32.1%, while the number of people experiencing homelessness has increased by approximately 49%. This pattern highlights the difficulty of translating increased investment into sustained reductions in homelessness across a multi-level system.

Increased funding alone cannot change outcomes in a system facing continued inflow into homelessness, long durations without housing, and responses spread across multiple sectors. While new social infrastructure is being developed, outcomes will *also* depend on how effectively policy, funding, and delivery are aligned across provincial systems and Service Manager operations. As fiscal pressures grow, labour-market conditions change, and external risks intensify, reliance on continued spending increases alone is not sustainable.

Protecting Ontario means ensuring that housing, homelessness, healthcare, justice, child welfare, social assistance, and employment systems have the capacity to respond effectively under sustained pressure.

Homelessness is one visible expression of broader strain across the social safety net. The broader question is whether current systems can produce stability over the life course—across housing, health, income security, disability support, ageing, and family wellbeing—rather than responding after instability has already taken hold.

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Technical appendix

This appendix summarizes methodological changes and updates from the previous report published in January 2025. This report focuses on differences in data collection, coverage, and estimation approaches.

For full methodology details, refer to the Technical Notes in the previous report: <https://www.amo.on.ca/sites/default/files/assets/DOCUMENTS/Reports/2025/2025-01-08-EndingChronicHomelessnessinOntario.pdf>

1. Data collection and coverage

Data collection

Compared to the previous collection cycle, data was collected from Service Managers for 2024 and 2025 only, whereas the previous report collected data from 2016 to 2024. The 2024 data collected in the current cycle replaces the 2024 data from the previous cycle.

This year's collection included approximately 10% of the data points from last year, focusing on:

- People experiencing homelessness
- Community housing (RGI) waitlist
- Program funding
- Program expenditures

Service Manager participation

All 47 Service Managers provided data for 2024 and 2025, with only a few missing data points. Some reported figures may not include data from all Service Managers due to the exclusion of outliers and/or timing of submissions.

Estimation approach

For Service Managers that provided year-to-date figures for 2025 (January through October or November), totals were projected to year end using the same methodology applied in the previous cycle. Data reported for 2024 in the current cycle replaced the year-to-date 2024 data from the previous cycle. The normalization process for annualizing point-in-time and monthly counts was refined to improve accuracy.

2. New metrics

Encampments

Encampment data was collected systematically for the first time in this cycle. While encampment questions were included in last year's collection, data quality was insufficient for reporting. In the current cycle, 46 of 47 Service Managers provided a point-in-time count of encampments.

Unsheltered homelessness

Point-in-time unsheltered homelessness counts were collected for the first time in this cycle. Of 47 Service Managers 43 provided a count, with figures representing people living outside or in places not intended for habitation.

3. Community housing waitlist

Data coverage

For 2024, all 47 Service Managers reported waitlist data. For 2025, 46 Service Managers reported. The missing value for 2025 was estimated using the aggregate year-over-year change (6.7%) observed among Service Managers that reported for both years.

Wait times

Wait-time data was reported by 45 Service Managers for 2024 and by 43 for 2025. Two Service Managers were excluded from averages due to extreme outlier values.

4. Funding and expenditures

Historical data (2018–2023)

Funding and expenditure data for 2018–2023 from the previous reporting cycle was carried forward unchanged. In that dataset, approximately 6% of funding data was estimated to fill gaps where some Service Managers had missing years.

Current data (2024–2025)

No missing values were filled or estimated for 2024 and 2025. Most Service Managers reported 2024 figures based on actuals (calendar year or fiscal year results), while 2025 values were drawn from approved budgets or year-to-date actuals prorated to represent the full year.

5. Comparability with other sources

The funding and expenditure data collected may not align with other reports or publicly available data for several reasons:

- Amounts reflect what was received rather than what was announced or committed over multi-year periods.
- Housing and homelessness program categorization differs from standard reporting structures.
- Service Managers often do not receive detailed statements specifying federal or provincial contributions in cost-shared programs.
- Some funding streams or program allocations outside the scope of this analysis may be included in other datasets.

6. Projection methodology

Model structure

The underlying projection model is unchanged from the previous report. It uses multiple linear regression with ridge regression, backward elimination, principal component analysis, and k-fold cross-validation.

Base Data

The model uses people experiencing homelessness (PEH) data from 2016 to 2025. For 2016 to 2023, standardized values produced during the previous reporting cycle were carried forward. For 2024 and 2025, data collected from Service Managers in the current cycle was used, with the same standardization process applied.

Scenario assumptions

The three scenarios (steady, upturn, downturn) use the same framework as the previous report, but assumptions have been updated to reflect significant shifts in the policy and economic landscape, including changes to trade policy, immigration targets, and housing market conditions. Updated assumptions also address persistent housing supply shortfalls, inadequate income supports, mental health treatment gaps, and emerging climate displacement risks.

Table 10: Changes to scenario assumptions from the previous report

Variable	Change	Rationale
Unemployment rate	Increased	Trade shocks and persistent structural barriers limit labour market matching, keeping unemployment elevated despite labour shortages.
Median household income	Decreased	Prolonged real income stagnation and constrained productivity keep income growth well below historical levels.
Core housing need	Increased	Ongoing housing supply shortfalls, inadequate income supports, and structural barriers to housing stability drive sustained growth.
Households with limitations	Unchanged	No new evidence indicating a material change from prior assumptions.
Maximum affordable shelter cost	Decreased (relative to market rents)	Income growth fails to keep pace with rent increases, widening the affordability gap for low-income households.
Median value of dwellings	Increased	Persistent housing supply constraints continue to place upward pressure on housing prices.

Comparability with the previous report

Projection results are not directly comparable to the previous report due to both updated base data and revised scenario assumptions. The higher projections in the current report reflect the incorporation of significant policy and economic shifts that were not present or anticipated in the previous report's assumptions. Under the steady scenario, homelessness is projected to reach 177,483 by 2035, compared to 156,241 in the previous report

This difference reflects new information about the economic and policy environment being incorporated into the model, not a change in the underlying methodology or model structure.

**THE REGIONAL MUNICIPALITY OF
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Applicants

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**PERSONS UNKNOWN AND TO BE
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Respondents

Court File No.: CV-25-00000750-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

Proceeding commenced at KITCHENER

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**2nd SUPPLEMENTAL RESPONDING
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