

## IMPLICATIONS OF LIMITING TEMPORARY SHELTER LOCATIONS

### Providing the Emergency Shelter Best Practices Guide

#### Recommendation

That Administration prepare amendments to Zoning Bylaw 20001, as outlined in Attachment 7 of the August 27, 2024, Community Services report CS02526, and return to a future City Council Public Hearing.

<b>Requested Action</b>	Committee decision required		
<b>ConnectEdmonton's Guiding Principle</b>	<b>ConnectEdmonton Strategic Goals</b>		
<b>CONNECTED</b> This unifies our work to achieve our strategic goals.	<b>Healthy City</b>		
<b>City Plan Values</b>	LIVE		
<b>City Plan Big City Move(s)</b>	Inclusive and compassionate	<b>Relationship to Council's Strategic Priorities</b>	Community safety and Well-being
<b>Corporate Business Plan</b>	Serving Edmontonians		
<b>Council Policy, Program or Project Relationships</b>	<ul style="list-style-type: none"> <li>City Policy C620 - Supporting Vulnerable People During Extreme Weather Conditions</li> </ul>		
<b>Related Council Discussions</b>	<ul style="list-style-type: none"> <li>May 8, 2019, Citizen Services report CR6674, Interim Housing</li> <li>August 30, 2021, Community Services report CS00506, Emergency Shelter Standards and Operating Requirements - Options</li> </ul>		

#### Previous Council/Committee Action

At the June 10, 2024, City Council Public Hearing meeting, the following motion was passed:

That Administration, as part of the City of Edmonton Minimum Emergency Shelter Standards review, provide a report on limiting the location of temporary shelters in the Community Services Use class in the Business Commercial Zone.

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## Executive Summary

- The October 23, 2023 City Council Public Hearing meeting motion “That Administration, as part of the City of Edmonton Minimum Emergency Shelter Standards review in 2024, include an investigation into the appropriate size of shelters, and provide any recommendations as necessary to regulate future shelters” is addressed as part of this report.
- Administration engaged with 12 organizations that provide shelter services, five collaboratives/coalitions/multisectoral tables, First Nations Governments, Indigenous organizations and City staff to inform the three-year review of the 2021 Minimum Emergency Shelter Standards, as well as the motions.
- The Government of Alberta was updated on the review of the Standards and concurrent work to respond to the motions regarding shelter size and location.
- Engagement resulted in a clear recommendation to change the Standard to a “Best Practices Guide”, recognizing the City of Edmonton does not fund or regulate emergency shelter operations but can continue to communicate evidence-based learnings in the City’s role as a Convener and Advocate as outlined in the City of Edmonton’s Homelessness and Housing Services Plan.<sup>1</sup> Engagement highlighted challenges by shelter operators to find suitable locations in residential and commercial areas and the need for flexibility in shelter size.
- The City of Edmonton Emergency Shelter Best Practices Guide replaces the City of Edmonton Minimum Emergency Shelter Standards. Administration will recommend that the Minimum Emergency Shelter Standards should be formally rescinded as part of the Fall 2024 General Repealing Bylaw. Key changes in the replacement approach includes:
  - The introduction of a Service Approach section to help shelter operators identify who they are going to serve.
  - The introduction of a Core Operations section which highlights the day-to-day operations and programming all emergency shelters should strive towards.
  - The replacement of “Specialized Program Requirements” with a Services and Programming Section, which highlights the unique needs of certain populations accessing shelter and programmatic supports shelter providers should consider in their service delivery.
- Engagement highlighted challenges by shelter operators to find suitable locations in residential and commercial areas and the need for flexibility in shelter size.
- Administration considered the implications of restricting shelter locations or size within the Commercial Business (CB) and the Business Employment (BE Zone) and identified that most properties zoned Commercial Business were not abutting Medium Industrial (IM) or Heavy Industrial (IH) properties.
- Business Employment (BE) properties do exist throughout Edmonton’s Established Non-Residential Areas and do sometimes serve as a transition zone to the other industrial zones.
- Administration does not recommend restricting shelter locations in the Commercial Business Zone. Administration also recommends a text amendment to Zoning Bylaw 20001 to remove

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<sup>1</sup> Attachment 1, CS01759, Homelessness and Housing Services Plan, July 3, 2023. Source: <https://pub-edmonton.escribemeetings.com/filestream.ashx?DocumentId=227822>

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the 500 square metres floor area limit from applying to shelters in the Business Employment (BE) Zone, but to restrict shelters from abutting sites zoned Heavy Industrial (IH).

### REPORT

#### 2021 City of Edmonton Minimum Emergency Shelter Standards - Review

As part of the Community and Public Services report CR\_7839 - Hope Mission Project Update, on March 15, 2021, City Council directed Administration to develop minimum emergency shelter standards that would increase accessibility and assist shelter operators in transitioning clients to housing. Edmonton's Minimum Emergency Shelter Standards were presented to the Community and Public Services Committee on August 25, 2021 (CS00506) and were endorsed by City Council on August 30, 2021. They were intended to serve as aspirational standards with associated outcomes that emergency shelter operators could adopt to address service gaps.

To update the Standards and respond to the two related motions (made at City Council Public Hearings October 23, 2023 and June 10, 2024), Administration completed a jurisdictional scan, literature review, and comprehensive internal and external engagement activities, including a review of the draft by the Canadian Shelter Transformation Network (Attachment 1 and Attachment 2).

As a result of this work, Administration revised the 2021 Standards to be the City of Edmonton 2024 Emergency Shelter Best Practices Guide (the 2024 Guide). The 2024 Guide includes a new approach for shelters to take to better define their services and who they are serving (Attachment 3).

#### System Changes

Through the engagement process, participants noted that the 2021 Standards helped communicate the service needs of Edmontonians experiencing homelessness. As the primary funder and regulator of emergency shelter services, the Government of Alberta published the 2022 Action Plan on Homelessness as the first steps out of the Coordinated Community Response to Homelessness Task Force Report.<sup>2</sup> While the 2022 Action Plan did not fully adopt the City's 2021 Standards, it integrated a number of actions that the Standards included as best practice. These best practices include supporting shelters to adopt a housing focused approach and evaluating the success of shelter operations on their ability to connect guests with appropriate resources and services.

The Government of Alberta implemented a number of actions that have improved the accessibility and quality of emergency shelter services in Edmonton since 2022, including:

- Increasing emergency shelter spaces in Edmonton from 629 spaces to more than 1,800 spaces.
- Adding a diversity of shelter providers, including Indigenous led organizations.
- Moving all Government of Alberta funded spaces to a 24/7 operating model.

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<sup>2</sup> Government of Alberta, Action Plan on Homelessness, September 2022. Source: <https://open.alberta.ca/dataset/5601187b-7dfc-45ab-8238-8f4c0be3c634/resource/0e21de0d-1248-4594-8268-0d96860723a0/download/css-action-plan-on-homelessness.pdf>

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- Piloting innovative service approaches at shelters, such as the shelter Service Hub Model at Hope Mission, which has a particular focus on diversion practices that redirect people from shelter to more suitable housing options where possible
- Increasing the diversity of bed options at sites, such as low mobility spaces, semi-private spaces and beds off the floor.
- Establishing the Navigation and Support Centre to expedite access to identification, facilitate access to income support for people experiencing homelessness and make connections to shelter and housing services.

Engagement feedback from shelter operators also noted that they are becoming increasingly efficient at diverting individuals from homelessness and housing individuals from emergency shelters. This work, however, is being hampered by the deficit of affordable housing stock and permanent supportive housing spaces available, which is limiting the number of people able to transition from shelter to housing. This challenge will likely compound due to population growth outpacing supply and the expected impacts on rental rates and vacancies.

### **City of Edmonton 2024 Emergency Shelter Best Practices Guide**

The goal of the 2024 Emergency Shelter Best Practices Guide (the 2024 Guide) is to support shelter providers by demonstrating how emergency shelters can be accessible and housing and diversion focused. This document guides emergency shelters to further the work of helping individuals resolve their homelessness in order to live safer, healthier lives. It is also a document that can be used by funders and other key stakeholders in Edmonton's homeless-serving system of care to inform future discussions about the role of emergency shelters in ending homelessness in Edmonton.

The Government of Alberta is the primary funder of emergency shelter spaces in Edmonton. As part of this funding arrangement, the Government of Alberta includes Shelter Accommodation Expectations as part of their funding agreements. This document outlines the minimum requirements that shelters must meet in order to receive funding. The Government of Alberta has communicated to Administration that much of what is included in the 2024 Guide is aligned with current shelter operations and indicate that in 2023-24, updates were made to align the Shelter Accommodation Expectations with a housing focused and recovery oriented approach to shelter service delivery.<sup>3</sup> Beyond contractual obligations, there is a benefit to improving understanding of how shelters operate more broadly among the homeless serving system of care, allied systems of care and the public. Since there is typically no role or funding assigned to the task of researching and sharing best practices for shelter operations, the 2024 Guide can help to fill this gap and is designed to be a resource to draw upon when advice and guidance on how to improve the shelter experience for guests is desired. The City of Edmonton recognizes that funding and available resources may limit a shelter site's ability to achieve all elements, and the Guide will continue to be aspirational in nature.

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<sup>3</sup> Government of Alberta, Alberta's Homelessness Response webpage, Accessed July 19, 2024. Source: <https://www.alberta.ca/homelessness-response#jumplinks-4>

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Major updates contained in the 2024 Guide are in response to the engagement results Administration gathered indicating that emergency shelters cannot be everything to everyone. Engagement feedback identified that since the first Standard was published in 2021, those accessing emergency shelter services are presenting with much more complex needs including addiction issues and mental health challenges. Engagement feedback also noted that demographically, more women, immigrants, refugees, seniors and youth are accessing shelter services.

As part of a new approach in the 2024 Guide, emergency shelter sites are encouraged to undertake an analysis about the type of shelter site they would like to be, who would best benefit from that shelter approach, what outcomes they are hoping to achieve and where in the city it makes the most sense to locate their shelter. This focused and intentional service and programming planning will help to inform the shelter approach particular sites should adopt.

This approach is in alignment with the new primary sections of the Guide:

- *Shelter Space Considerations* - Building and space layout approaches that all shelters can strive to achieve, to increase the safety and comfort of guests.
- *Core Operations* - Operational elements that all shelters can strive towards, in order to provide a consistent service experience for shelter clients.
- *Services and Programming* - Once a shelter has identified its scope, population specific programming and services can be identified and implemented at that site.

For more details and additional information, please see Attachment 3 for the City of Edmonton 2024 Emergency Shelter Best Practices Guide.

### **Shelter Size and Location - Engagement**

As part of the 2024 Guide engagement, participants were asked to provide their feedback on the size, location and spacing of emergency shelter locations in Edmonton.

Administration heard that the City should not create restrictions on the sizes, location or spacing of shelters. When asked about the ideal size of shelters, feedback resulted in size ranges of 30-50 or 100-125 persons per site, depending on the programming model. However, these shelter sizes were identified as being optimal and would not necessarily be attained when considering funding and physical space limitations.

Concerns about limitations focused on a worry that shelter operators would not have the flexibility to quickly create new shelter sites or increase capacity at current sites as needed (e.g. to respond to an emergency like the pandemic or if an established site had to close unexpectedly), that operators would not be able to open shelters where the geographic need was greatest and that funding opportunities may be lost if limitations were in place.

Operators also noted the difficulty in finding suitable locations for emergency shelters, particularly in locating landlords willing to lease for an emergency shelter use and in finding locations that satisfy space and layout requirements, while also being affordable. Feedback noted that shelter site searches were routinely not able to find adequate shelter sites in residential or commercial areas.

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See Attachment 2 for the What We Heard Report: Minimum Emergency Shelter Standards Review for more discussion on the challenges shelter operators face in finding suitable locations.

### **Shelter Size and Locations - Zoning Bylaw 20001**

Zoning Bylaw 20001 permits the Community Service Use (which includes Year-Round Shelters and Seasonal Shelters) in many residential, commercial, mixed use and urban service zones to maximize the opportunity to locate shelters where there is a need in the city with minimal barriers.

The Community Service Use is also permitted in the Business Employment (BE) Zone but limits the maximum floor area of this use to 500 square metres. This limit was established to limit the scale of this use because of its potential proximity to industrial sites that may have risk sources or nuisances—such as noise, dust or other potentially hazardous materials—and to ensure these sites are generally maintained for business industrial purposes. Larger-scaled Community Service facilities may be considered through a variance to allow the development planner the discretion to evaluate the appropriateness and balance between the specific site context, development proposal, policy objectives of the City and any other considerations.

### **Shelter Locations in Non-Residential Areas**

At the June 10, 2024 City Council Public Hearing meeting, a rezoning application for a proposed shelter by Hope Mission members of City Council spoke to concerns about the suitability of shelters on sites where the Business Commercial (CB) Zone or the Business Employment (BE) Zone may be located. Council directed Administration to investigate the implications of limiting shelters from locating in these zones.

A jurisdictional scan of six Canadian municipalities revealed inconsistent regulations for shelters in industrial zones. Toronto, Vancouver and Winnipeg allow shelters in light-industrial zones with restrictions, while Calgary, Victoria and Ottawa do not (Attachment 4). Administration also reviewed all existing properties zoned Business Commercial and Business Employment and its geographical location (Attachments 5 and 6). Most Business Commercial properties did not abut properties zoned Medium Industrial (IM) or Heavy Industrial (IH) while a higher proportion of Business Employment properties did abut Medium and Heavy Industrial properties.

### **Shelter Size and Location - Recommendation**

Places where people live, permanently or temporarily, should be safe. Where possible, shelters should be located where there is access to amenities and transportation and be separated from risk sources. However, these locations are also likely to face greater demand for other forms of development and result in shelter operators facing competition to secure these types of locations. Given the challenges shelter operators face in finding a location (Attachment 2) and the critical need to provide shelter for those who need it, Administration recognizes the requirement to balance locating shelters in suitable locations while providing the flexibility to locate shelters where buildings and sites are available but do not have preferred amenities.

Based on the feedback received through engagement, and Administration's research into where Business Employment and Business Commercial zoned sites are located, Administration does not

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recommend regulations restricting shelters in the Business Commercial Zone. As the research shows, Business Commercial sites are generally on the periphery of Edmonton's employment areas and most sites are not abutting the Medium and Heavy Industrial zones. It is unlikely that a potential shelter being located in the Business Commercial Zone will be in proximity to risk sources.

Further, Administration proposes that shelters in the Business Employment Zone be prohibited from locating beside sites zoned Heavy Industrial but not Medium Industrial (Attachment 7). This intends to mitigate concerns about locating shelters near sites with potential high risk sources while still maintaining more options for shelters to be located on Business Employment sites.

Zoning Bylaw 20001 also provides a tool to the Development Planner to consider risk for a development by being able to ask for a risk assessment as part of a development permit application if a shelter is proposed within:

- 500 metres of a rail line, high pressure pipeline, or dangerous goods route, or
- 1.5 km of a site zoned Heavy Industrial (IH) or a site associated with storing or manufacturing dangerous goods or hazardous substances.

This assessment would determine if there is any risk associated with the proposed location and any potential mitigation recommendations. The Development Planner may consider the recommendations and then impose any conditions to the development permit necessary to implement mitigation measures identified in the risk assessment. This regulation is not zone dependent and it allows the Development Planner an opportunity to assess the potential risk of a location on a site-specific basis.

Finally, Administration recommends that Year-Round Shelters and Seasonal Shelters be exempted from the floor area limit in the Business Employment Zone. This responds to feedback from shelter operators on the importance of having flexibility to allow the opportunity to provide wraparound services within one location or to increase / decrease the size of an operation with minimal barriers. Maintaining a floor area limit may result in shelter operations accommodating the same or more people within less space or without the needed support services, which could result in a less effective operation.

### **Next Steps**

Administration will recommend that the Minimum Emergency Shelter Standards should be formally rescinded as part of the Fall 2024 General Repealing Bylaw.

Administration will continue to be available to emergency shelter providers to support their continuous improvement efforts and to use the Guide to improve the experience of their guests.

In its role as a Convener and Advocate, as outlined in the City of Edmonton's Homelessness and Housing Services Plan, the City will continue to work with the Government of Alberta to share best practice evidence and research on shelter operations through the Guide in order to support the mutual efforts to respond, prevent and resolve homelessness in Edmonton.

If Administration's recommendation for the proposed text amendment to Zoning Bylaw 20001 (Attachment 7) is approved, a report will be scheduled for a future Public Hearing. This provides

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time for City Council to consider the proposed amendments and if approved, allow development permits for proposed shelters to be reviewed under the new rules in time for the 2024 winter season. If Urban Planning Committee proposes other changes or additional requirements, Administration would incorporate the changes into the future Public Hearing report.

### **Community Insight**

The City of Edmonton Emergency Shelter Best Practices Guide was developed using a wide range of engagement and research inputs. These engagement activities consisted of two rounds of public and internal engagement between April and July 2024.

The first round of engagement sought to understand how the shelter ecosystem has changed since the City of Edmonton Minimum Emergency Shelter Standards were adopted in 2021, gather feedback on those Shelter Standards and identify innovative and best practices to integrate into a revised City of Edmonton Emergency Shelter Best Practices Guide. Consultations also took place to gather stakeholder feedback on Council motions related to the size and location of emergency shelters in Edmonton.

The engagement approach provided a wide range of options for stakeholders to provide input and feedback. This included: virtual, in-person, and hybrid focus groups, one on one meetings, site visits, surveys and attending existing collaborative tables. This resulted in Administration engaging with:

- 12 organizations that provide shelter services
- Five collaboratives/coalitions/multisectoral tables
- First Nations Governments and organizations
- City staff

During the engagement sessions, Administration heard consensus that the shelter system and shelter services have improved over the last three years. These improvements include observations that shelter sites:

- Are cleaner and better organized;
- Provide better access to hygiene related infrastructure and products;
- Have increased the availability of day sleeping spaces;
- Are offering more low barrier beds; and
- Offer a greater range of sleeping spaces including some private and semi-private spaces.

Administration heard positive feedback for the Government of Alberta for increased shelter investments, supporting shelters to move to a 24/7 model and launching the Navigation and Support Centre.

While research done over the past few years with people with lived and living experience of housing insecurity informed this report, no further engagement was done specifically for this, due primarily to concerns of engagement fatigue.

Themes from that recent research support the insights of this report. Specifically, the research highlights that housing options must be considered as more than just four walls and a roof. A key part of this is that being able to have a good sleep is central to being able to live a good life;



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beyond this, all supports and services must value peoples' dignity, center meaningful relationships and allow people to have choice and agency in their daily lives.

Specific concerns of people using shelters have included the lack of options for storing personal items, lack of safety and exposure to gangs, mandatory sobriety rules, the separation of couples and religious rituals.

These findings, combined with a jurisdictional scan and research, informed the development of the draft City of Edmonton Emergency Shelter Best Practices Guide. In order to further refine the draft, the contents were socialized in a second round of engagement with internal and external stakeholders, as well as with the Canadian Shelter Transformation Network. This second round of engagement consisted primarily of a detailed survey to capture perspectives.

### **GBA+**

Historically, 2SLGBTQ+ Canadians, as well as other at-risk groups, including youth, seniors, Indigenous People, newcomers and/or people with mental health or addiction issues have accounted for a large percentage of Canadians who are homeless, at risk of being homeless or in core housing need<sup>4</sup>. In Edmonton, consistent with national research, Indigenous adults and youth experience a higher rate of unsheltered homelessness, compared to non-Indigenous adults and youth.

People experiencing homelessness have high rates of complex health needs but low rates of preventative and/or non-emergent health care use. Research shows that people experiencing homelessness are at increased risk of opioid poisoning and contracting communicable diseases such as COVID-19 and most recently, shigella. In the colder months of the year, people experiencing unsheltered homelessness are at increased risk of fire injury or death and amputation due to exposure.

### **Environment and Climate Review**

Individuals at risk of or experiencing homelessness experience the impacts of climate change disproportionately. Actions the City takes to address homelessness contribute towards increased climate resilience as they can help mitigate exposure to climate related events that present health risks to an already vulnerable population.

Extreme weather events and other climate change related effects, such as increased wildfire smoke, disproportionately affect vulnerable Edmontonians. For example, people experiencing homelessness have less options for escaping wildfire smoke by escaping indoors and extreme cold events have led to a disproportionate number of Edmontonians experiencing homelessness facing amputations<sup>5</sup>.

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<sup>4</sup> "2SLGBTQIA+ Housing Needs and Challenges." Canadian Mortgage and Housing Corporation. June 20, 2022. Source: <https://www.cmhc-schl.gc.ca/blog/2022/2slgbtqia-housing-needs-challenges>

<sup>5</sup> Source: <https://www.cbc.ca/news/canada/edmonton/most-frostbite-amputation-hospital-visits-in-edmonton-last-ye-ar-were-for-homeless-patients-1.7086836>. Accessed June 20, 2024

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Ensuring a diversity of shelters across the City will provide options for vulnerable Edmontonians to remain safe from the effects of climate change.

### **Attachments**

1. Emergency Shelter Standards Review: Project Background and Inputs
2. What We Heard Report: Minimum Emergency Shelter Standards Review
3. City of Edmonton Emergency Shelter Best Practices Guide 2024
4. Jurisdictional Scan - Shelters in Industrial Zones
5. Business Employment and Business Commercial Property Locations
6. Analysis of Business Employment and Business Commercial Sites
7. Markup and Rationale of Proposed Zoning Bylaw Text Amendment