



TO: **Planning and Housing Committee**

DATE: Monday, June 28, 2021

RE: A New Regulatory Framework for Multi-tenant Houses (**PH25.10**)

Thank you for the opportunity to speak with you today on behalf of the Toronto Alliance to End Homelessness (TAEH). As you know, the TAEH is a network of partners reaching across the city, all united in the vision of ending homelessness. We also serve as your non-Indigenous Community Advisory Board, and co-chair the Toronto Housing and Homelessness Service Planning Forum with SSHA.

We commend City staff from all the divisions that contributed to the vision of a human rights approach to affordable housing for everyone in Toronto, wherever they want to live, in today's report for Item 25.10.

As you know the Alliance's priorities include the existence of enough deeply affordable housing in Toronto for those on the lowest incomes, including but not limited to people in receipt of social assistance. The report today rightly stresses the critical role of multi-tenant houses in filling this need, and that these homes must be safe, of quality, accessible and available wherever people chose to live, not just in parts of pre-amalgamated Toronto where they are currently "allowed," let alone regulated.

Today's report includes many strong ideas that we are pleased to support. These include taking a phased approach, a funding plan for upgrades, strategies for tenant and landlord outreach and an inter-divisional Housing-At-Risk Working Group. We are concerned, however, that most of these are not actually included in the list of recommendations.

It is critical that any next steps do not create more homelessness. Even when implementing what we agree is a much-needed new approach to multi-tenant housing, we must ensure that there is no collateral damage to people currently living in them. We are pleased to see that today's report repeatedly states that this is not the City's intent, and therefore propose the following amendments to make the new framework stronger in its ability to avoid this:

Exempt all non-profit operators of multi-tenant homes from the proposed room caps.

The TAEH fully understands the concerns that higher rooms per building can sometimes create, but believe that non-profit agencies, with a proven history of quality programming and a relationship with the City to support smooth operations, can avoid these concerns.

We understand that the City of Toronto will work in a separate process with the RGI housing providers it funds, and that the goal is to create flexibility and supports for compliance on a case-by-case basis that keeps viable multi-tenant homes open. We also understand that provincially funded, supportive and other housing providers are not included in the definition of a multi-tenant home for the purposes of the new by-law. These are both positive elements, but it remains unclear if they address all non-profit homes in Toronto.

Not limiting the number of rooms in non-profit homes will go a long way to avoiding unnecessary homelessness for some of the most vulnerable people in Toronto. For most non-profit providers, a room cap of 6 means that it is entirely unfeasible financially to support a home. We will lose 100s of units currently housing people if all programs with more than 6 rooms are forced to close. This includes residential programs and personal care homes that support people with developmental and other disabilities, mental health and addiction challenges and chronic health issues. The Alliance urges this Committee to amend the report to include a recommendation to avoid this unnecessary outcome.

Additionally, as the City continues to make progress on creating more housing options for people experiencing homelessness, addressing room caps in the non-profit sector will allow many *more* suitable homes to be created. The sector can leverage opportunities and resources to do so, only, in most cases, if they can create programs in homes with more than 6 rooms. Amending today's report is a cost-effective way to create more housing.

Put measures in place to both prevent, and if they occur, quickly respond to displacements of tenants.

There is no doubt that displacements resulting from the implementation of this new framework will result in homelessness for most people. Multi-tenant housing is the most deeply affordable housing we have, and is often accessed by those leaving, or at risk of, homelessness. And with Toronto's housing market as it is, there really is no other place to go for most tenants being displaced.

As noted above, allowing non-profit homes to have more than 6 rooms will also keep many people from being displaced. To further aid in the prevention of displacements, **Recommendation 21 can be strengthened by adding a direction to the Multi-Tenant House Licensing Tribunal to have regard for the risk of displacements to tenants.**

The TAEH supports Recommendation 49 and its direction to staff "to report back by November 2021 with a set of recommendations aimed at supporting tenants in the event of required emergency relocations and/or unit closures." In addition to the possible tactics outlined in the report, more detailed actions need to be articulated.

Any emergency relocation strategy must include specific commitments that are robust enough to truly re-house people as quickly as possible. We are more than ready to work with staff to help develop this strategy and recommend that measures including a new housing allowance program for those being displaced due to new regulations, a constructive process to work with landlords to support compliance in ways that avoid displacement and having a set of units "on stand-by" for immediate needs be seriously considered.

Include direction to develop a financial incentive program to operators to comply with the new regulations in an actual recommendation in today's report.

The report does talk to the affordability challenges that many landlords will face, and that it is not the City's intent to create more homelessness through this new regulatory framework. We recognize this and urge Committee to **make the financial incentive plan needed to meet these challenges a sure thing by including a new recommendation to that effect.**

In addition to the amendments proposed above, the TAEH also urges the City to **continue to engage and work with operators of personal care multi-tenant houses.** This model of housing is an essential part of Toronto's resources to house and support vulnerable people who may otherwise be homeless. For personal care programs to comply with the new by-law – not to mention creating even more quality personal care multi-tenant homes as today's report also acknowledges is needed – operators must be supported financially in compliance and be part of developing strategies that do not become barriers to operating their programs.

CONCLUSION

In conclusion, the TAEH welcomes and supports this direction on creating the regulatory and compliance framework for multi-tenant Houses across Toronto. This is an important opportunity for **a collective reimagining of what high quality, multi-tenant homes can be**, including thinking beyond fire, room limits etc. to what other elements create inclusive, supportive homes and communities. We look forward to next steps, including where we can be helpful in strengthening the recommendations and outcomes of implementing it.

Thank you,
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