

## Strategic Advice for City Building

November 16, 2020

Chair, and Members Planning and Housing Committee  
City of Toronto  
100 Queen St. W.  
Toronto, ON M5H 2N2

Dear Chair Bailao, and Members:

**RE: PH18.2 Creating the Regulatory and Compliance Framework for Multi-tenant Houses across Toronto**

I am writing to the Committee on behalf of my client, the Sorority and Fraternity Federation of Toronto (SOFRA), an umbrella group representing the common interests of twenty houses in the vicinity of the University of Toronto St. George Campus. These sororal and fraternal houses have a long history of providing support to students at the University of Toronto, including safe and comfortable sharing of accommodation in these private single family residences.

SOFRA would like to be engaged with the City in the discussions and consultations regarding any proposed new framework for Multi-Tenant Houses. It is SOFRA's position that its historic exemption from any Licensing requirements should remain, and we will work with the City to address any legitimate concerns about our houses that are raised.

We believe the City already has adequate Municipal By-laws and enforcement capabilities addressing property standards, waste, and noise that apply to these houses just as they apply to any other house within the City of Toronto.

For over one-hundred years these houses have been identified as a different and distinct use from that of a rooming house by the current and former City of Toronto. The City has recognised the unique nature of these houses in legislation on multiple occasions including in By-law 774-83, where these houses were specifically "deemed not to be a rooming house". It is important for Committee Members to understand that these houses are organized no differently than any other "single housekeeping unit" in the City. The ability to reside there is limited to members of their house. There is no Landlord and Tenant relationship between the house and its residents, and as found by the Landlord and Tenant Board (TSL-49812-14) the Residential Tenancies Act does not apply.

We will work with the City in good faith to understand and address your concerns, however we remain concerned that there are forces that are pursuing SOFRA houses for increased gentrification, and wish to push out students in need of affordable accommodation from a community that SOFRA houses have been a part of since 1879.

Yours truly,



Peter Milczyn, B.Arch. MRAIC  
Principal