

Chartland Community, Ward 23, North Scarborough

Toronto City Council Meeting, October 1, 2021

Re: PH25.10, A New Regulatory Framework for Multi-Tenant Housing

29 September 2021

Why Many Suburban District Constituents are Angry with the City's MTH Report Recommendations, and our Suggestions for Moving Forward.

Dear Mayor Tory and Members of Council:

Our Chartland Community is located near Brimley Rd. and Finch Avenue in North Scarborough. We encompass about 350 homes. While the Chartland Community Association (CCA) is no longer registered, a group of us, including some former Executives of the Association, continue to act in the interests of the community.

This submission is in two parts.

The first addresses how the proposed regulations need to be changed for the good of the current and future MTH tenants and the health of the neighborhoods they call home.

The second addresses how the City must revamp the entire enforcement process and clean up the growing chaos being caused by illegal MTH which are rapidly taking over our suburban communities.

Part 1: Suburban residents are angry about the City's Proposal:

The report has recommended the following regulations:

- **Any number of Multi Tenant Houses** would be **permitted in all suburban neighbourhoods**
- MTH to be **allowed anywhere in the residential communities without restrictions.**
- The **minimum separation** between MTH **would not be required**
- The **maximum allowable size** for a Suburban MTH **would be 6 dwelling rooms with no limits on the numbers of tenants!**

Scarborough's current MTH bylaw permits a second suite plus 2 boarders, or about 4 tenants. **The proposed 6 dwelling room MTH could house 12 tenants or triple the maximum size currently allowed in Scarborough. This would also be allowed in North York and Etobicoke/York Districts**

- The Report **excludes** a requirement for a **minimum floor area for tenants**, (a protection for *liveability and fire safety*)
- **Corporations and businesses, including numbered companies, could set up MTHs.** Even foreign, US or out-of-province companies/businesses/ individuals and investors would be allowed to own and operate a licensed MTH
- **Owners/Operators** of an MTH would **not be required to live on site** for a licence to be granted. (*Emergencies and site infractions would be harder to deal with*).

New corporate investment will be attracted to buy up family homes and convert them to prestige home rentals and upscale MTH which often makes them unaffordable. The additional corporate purchases from the limited housing market will likely reduce the number of homes still on the market for affordable housing.

Many Suburban homeowners have expressed “Why don’t we have any property rights anymore....We’ve worked hard, made mortgage payments, paid property taxes and now we’re having our basic rights taken away from us.” Many have asked whether their local property values could decline relative to Markham or Mississauga where they have clearer policies to regulate MTH.

It is ironic that most downtown residential areas won’t be affected by the regulations because most of them haven’t changed for years.

This proposal is not an equitable initiative by the City where 1.9 million suburban residents (¾ of the population) could suddenly be subjected to the shock of major zoning and property entitlement changes. This could trigger substantial and ongoing changes to their neighbourhoods and the quality of life they have enjoyed for years!

Suburban constituents have a major concern that the proposed maximum MTH Size for the Suburbs, is 6 dwelling rooms per MTH. This value is inappropriately high for the suburbs and should be reduced. The MTH maximum of 6 was developed for the former City of Toronto in earlier years based on the concept of residential density. An examination of Ward data profiles shows that today the residential density of downtown Wards is about 2 to 4 times higher than Wards in Scarborough. Scarborough should have a maximum MTH size that is proportionately lower.

Chartland respectfully recommends a maximum of 4 dwelling rooms per MTH as the proper standard for the suburbs. That smaller MTH size is more easily accommodated by the much lower scale of built development and the size of homes in our neighbourhoods. A smaller MTH helps tenants better fit into their new community and be welcomed by their new neighbours.

Mississauga has licensed lodging houses (their MTH equivalent). The maximum allowable size is 4 dwelling rooms. Their bylaw also sets a limit of 4 tenants in each lodging house. The urban structure and development density of Scarborough is more similar to Mississauga’s residential areas than it is to downtown Toronto.

Putting a cap on the number of tenants allowed in an MTH, closes an enforcement loophole. It thereby reduces uncertainty and risk for tenants, enforcement staff, administration staff, residents, homeowners, and police/fire departments.

Chartland has had 15 years of experience with illegal rooming houses of all sizes. Given our knowledge of the community values and needs, Chartland residents respectfully recommend:

- 1. The maximum number of Suburban MTH dwelling rooms be reduced to 4**
- 2. The number of tenants in a Suburban MTH be capped at 6**
- 3. Owner occupancy is required**
- 4. A minimum floor area be specified for each tenant**
- 5. A minimum separation between MTH be established....we would suggest 200 metres**
- 6. A more staged and calculated strategy be developed for private sector involvement**

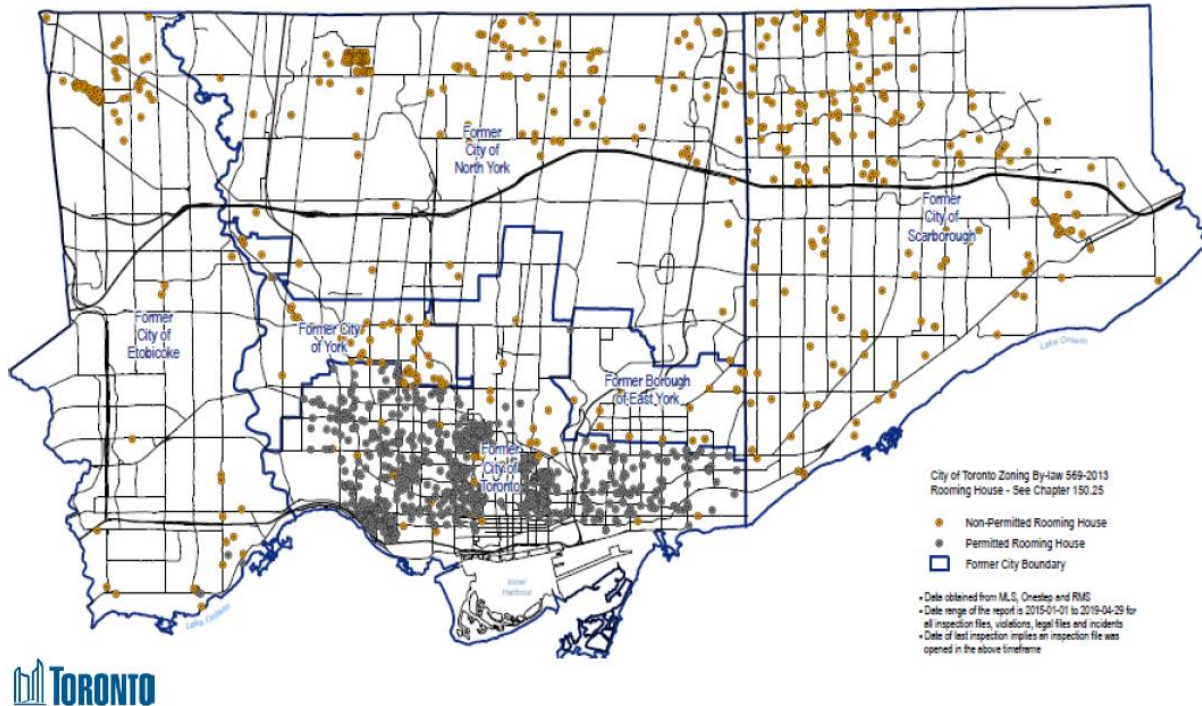
These recommendations represent a reasonable starting point based on current conditions in Scarborough. These rules are both progressive and conservative, and **can always be adjusted in the future to meet the needs of the time**. The proposed City regulations suddenly change too many regulations at the same time and are just too extreme. These changes could be destructive to our stable Suburban communities that we have worked so hard to build.

The current proposal tramples the rights of Suburban homeowners and some tenants. This situation will only get worse if the current City proposal is signed off without attention to the demonstrated points of controversy.

Part 2: What needs to be changed in Toronto's ongoing Enforcement Process

To help understand the challenges of the enforcement process, this map from a City presentation to the PHC on November 17, 2020, shows the locations of MTH, both legal and illegal. It gives insight into the areas of the City where MTH are most needed. The black dots are the legal MTH while the brown dots are the illegals.

Despite current zoning, unlicensed multi-tenant houses operate across the city.



2

In 2019, Scarborough had over 165 known illegal MTHs, many more than any of the other three Districts in Toronto. Community experience in Scarborough since 2019 suggests that the illegals have continued to grow rapidly. The largest concentration of illegals in Scarborough is north of the 401.

In 2017, after the first round of public consultations as part of the City's Rooming House Review, the City released a consultation report that contained the following recommendations :

“Better enforcement of rooming houses is needed

- The current system is seen as ineffective
- Better enforcement requires a change in strategy
- Better enforcement requires a change to the rules
- Better enforcement means system changes
- Better enforcement means tougher penalties “

Since that time, our community has not observed noticeable improvements in enforcement. In fact things have only become worse. Even now, there is a remarkable absence of enforcement action in our community. Letters and 311 calls are ignored. And with the recent surge in new

illegal MTH activity without building permits, conditions are getting much worse. On one street, the 4 most recent sales of family homes developed into 3 new illegal MTH. A further driver of suburban anger! The City's responsibility for the enforcement of illegal MTH must be resumed in the suburbs

The best time for enforcement action is at the *first sign of an illegal residence*. Quick action sends a strong message and warning that illegal operations will not be tolerated. Every new illegal MTH that surfaces will needlessly burn through the enforcement budget with ongoing monitoring, complaint handling and City attempts to gain entry and lay charges. In addition, every new illegal MTH may put tenants at risk.

At the present time there are only 6 enforcement officers for the whole city. That's 1 ½ officers for each District! That can't possibly do the job.

The Current Enforcement Process needs to be Revamped and Put into Action

New best practices for enforcement are vitally needed, such as;

- Drawing from new approaches, successes and research from other cities.
- Revamping traditional practices such as:
 - After 3 failures to gain entry the file for that address is closed
 - Use more shift work. Most illegal MTH activity doesn't occur until evening hours when MTH occupants are home. Regular enforcement shifts don't work. Overtime should be considered in special cases
- Senior City Management needs to challenge the Province to update privacy laws to include consideration of the need for updated laws concerning the right to enter private homes. In the case of illegal MTH, it's about tenant safety and the possible loss of lives. These Privacy Laws also need to be put under the human rights lens as well!

Licensing of MTH, across Toronto, is needed to provide safer, more secure and affordable housing for the homeless and economically disadvantaged. The status quo must not continue.

But that does not justify rapid reflex action to change MTH regulations that may lead to extreme consequences

It is respectfully requested that

- 1) The proposed MTH program not proceed at this time, as originally planned.**
- 2) An enhanced Enforcement Program should be initiated immediately, using the best practices available to clear the backlog of illegal MTH**
- 3) Upon completion of this Enforcement Program, revise the proposed MTH regulations, in accordance with the 6 Chartland recommendations, and hold a**

major City MTH Review to learn from the experiences and chart the best way forward.

Sincerely,

Chartland Community,

Gregory Saldanha

Pauline Ling

Murray McLeod, Past President CCA

Greg Olsen, Past President CCA

Dave Currie, Past President CCA

Linda Stafford, Past Treasurer and Newsletter Editor CCA

Gord Blackwell,

Anneke Blackwell,

Merv Courtney,

Rolf Rogde,

Gord Stephens,

Ian Davies