REGULATORY & COMPLIANCE FRAMEWORK FOR MULTI-TENANT (ROOMING) HOUSES ACROSS TORONTO

COMMUNITY ENGAGEMENT SUMMARY REPORT

TORONTO

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1. Project Overview

The City licenses multi-tenant houses, commonly known as rooming houses, to ensure that they are safe and well-maintained. The existing zoning and licensing regulations for multi-tenant houses in Toronto are inconsistent among the former municipalities as they were not updated after amalgamation. Currently, multi-tenant houses are only permitted in the former city of Toronto and some parts of the former cities of York and Etobicoke. Houses in the former cities of Toronto and Etobicoke require a licence, whereas a licence is not required in the former city of York.

The City is proposing the creation of a comprehensive city-wide zoning approach and enhancements to licensing and enforcement to encourage and regulate safe, liveable, well-maintained and affordable multi-tenant houses across the city.

The proposed regulatory framework has four parts:

- Enhanced operator licensing requirements to promote health and safety;
- An enforcement and compliance program;
- City-wide zoning standards that permit the use across the city, and
- Initiatives to support tenants and maintain affordability of housing.

2. Engagement Process

The City of Toronto initiated a community engagement process from April 23 to May 28, 2021. The community engagement process took into consideration the expert advice of Toronto's Medical Officer of Health to practice physical distancing to help reduce the spread of COVID-19 and protect the health and safety of Toronto residents and staff.

The City of Toronto retained LURA Consulting to assist the City with the community engagement process in an independent role, including developing and implementing an engagement, consultation and communication plan for the project.

The engagement and communications process included a project webpage, social media posts, leveraging stakeholder networks, public notices, overview presentation, information sheet, print and digital ads, virtual public meetings, stakeholder meetings, online and phone feedback forms, and a Do-It-Yourself (DIY) meeting toolkit – all to provide residents with a variety of engagement opportunities to learn more about the proposed framework and provide feedback. Engagement and communication materials can be found in the appendices.

How We Engaged (Engagement Activities)

A total of 1,729 people were engaged over the course of the engagement process between April 23 to May 28, 2021. The list below provides an overview of the engagement activities and participation.

- Public Community Engagement Meetings: 2
- Stakeholder Meetings: 11
- Do-It-Yourself (DIY) Workshops Completed*: 14
- Total Number of Participants at Public Community Engagement Meetings: 193
- Total Number of Participants at Stakeholder Meetings: 177

- Total Number of Participants through DIY Workshops*: 326
- Total Number of Online and Phone Questionnaires Completed: 1035
- Total Number of Email Feedback Received: 28

* This includes completed workshops by May 28th, 2021. City staff will be receiving and reviewing additional completed DIY Workshops following the completion of this report.

Virtual Stakeholder Meetings

City staff and LURA co-hosted eleven virtual meetings with stakeholder groups to present the proposed framework and have in-depth discussions to learn about the unique experiences and insights provided by stakeholders about how the regulation of multi-tenant houses can be improved. A list of stakeholder meetings held is included below. Meeting summaries are included in **Appendix A**.

Stakeholder Group	Meeting Date and Time
Multi-tenant housing operators/owners: licensed and unlicensed	April 27, 2021 - 6:30 p.m. - 8:00 p.m.
Tenants of both licensed and unlicensed multi-tenant housing	April 29, 2021 - 6:30 p.m. - 8:00 p.m.
Tenant service agencies (related to housing, settlement, and vulnerable populations)	May 3, 2021 - 1:30 p.m.- 3:00 p.m.
Post-secondary institutions	May 6, 2021 - 6:30 p.m. – 8:00 p.m.
Fraternity and Sorority Owners/Operators	May 7, 2021 - 1:30 p.m-3:00 p.m.
Housing advocacy groups and academics	May 10, 2021 - 1:30 p.m. -3:00 p.m.
Residents Associations	May 10, 2021 - 6:30 p.m. -8:00 p.m.
Housing organizations and providers	May 12, 2021 - 1:30 p.m. -3:00 p.m.
Post-secondary students	May 12, 2021 - 6:30 p.m. -8:00 p.m.
Multi-tenant housing operators/owners: personal care	May 17, 2021 -1:30 p.m. -3:00 p.m.
Residents Associations Follow-up Session	May 27, 2021 - 6:30 p.m. -8:00 p.m.

Virtual Community Engagement Meetings

The City of Toronto held two community meetings on the regulatory and compliance framework for multi-tenant (rooming) houses across Toronto online using Webex Events. The purpose of these community meetings was to:
- Present the proposed regulatory framework;
- Answer questions of clarification; and
- Gather feedback about how the proposed city-wide regulation of multi-tenant houses can be improved.

The first meeting was held on Tuesday, May 4th, 2021, from 6:30 p.m. to 8:30 p.m. and the second meeting was held on Tuesday, May 11th, 2021, from 12:30 p.m. to 2:30 p.m. Each meeting included a presentation on the proposed framework from Carola Perez-Book, City Planning and Emma Bowley,

Municipal Licensing and Standards. Following the presentations, participants were invited to ask questions and provide feedback verbally or though writing in the WebEx Q&A function. City staff responded to questions and LURA Consulting recorded feedback received. Participants could join the virtual meetings either online or by phone to listen to the presentation, ask questions, and provide feedback. Meeting summaries are included in **Appendix B**.

Online and Telephone Questionnaire

An online and telephone questionnaire was launched on March 4th, 2021 and remained open to collect feedback until March 18th, 2021. The questionnaire was intended to collect questions, concerns and ideas for the proposed city-wide regulation of multi-tenant houses. A total of 1035 responses were received. This included 1033 online responses were collected as well as 2 telephone responses. A summary of the feedback form responses can be found in **Appendix C**.

As a city-wide project intended to reach all Torontonians, the regulatory and compliance framework for multi-tenant (rooming) houses community engagement aimed to have a widespread geographic reach across the city. The map below indicates the Forward Sortation Area (i.e., the first 3-digit zone of every postal code, such as M6J) of 726 respondents that participated in the online questionnaire. Please note, this information was optional and was not provided by every respondent.
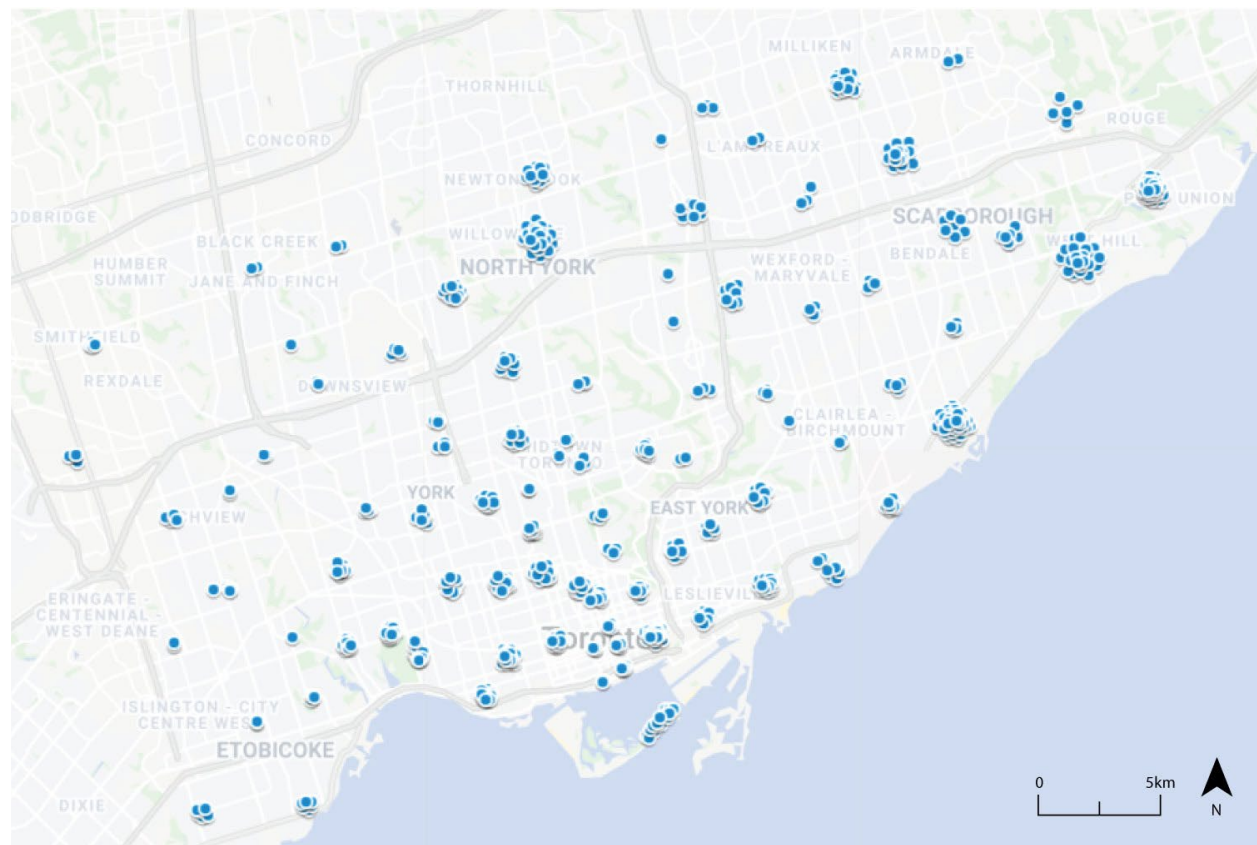
● Participant Postal Code Location

*Not shown on this map: One pin each from Belleville, Halton Hills, Markham, Montreal, Ottawa, and Welland. Two pins from Richmond Hill, three from Mississaugaand seven pins from Kanata.

Do-It-Yourself Workshops

To enhance participation from equity-seeking groups, multi-tenant housing tenants, operators, and other groups who do not tend to participate in traditional consultations, the City provided grants to eligible organizations to facilitate their own engagement sessions with their communities using a Do-It-Yourself (DIY) Workshop kit produced by LURA Consulting. This approach resulted in increased engagement and representation of groups that are usually under-represented in municipal public consultation processes. This engagement activity was completed by 14 organizations and included participation from tenants, student tenants, homeless or at-risk of homelessness youth, operators, and racially marginalized populations.

A list of organizations who hosted their own community-led consultations and the summary reports received can be found in **Appendix D**. This engagement summary report includes completed workshops and DIY reports submitted to LURA Consulting by May 28th, 2021. City staff will be receiving and reviewing additional completed DIY Workshops following the completion of this report. A copy of the Do-It-Yourself (DIY) Workshop kit provided to organizations to host their own session can be found in **Appendix E.**

Who We Engaged (Target Audiences)

The two broad audiences engaged were members of the general public and stakeholders across various sectors.

General Public

The consultation process targeted residents of Toronto. This included those who are familiar with multi-tenant housing in their neighbourhoods because they are currently operating legally and illegally as well as those who may not be familiar with this form of affordable housing.

Stakeholders

The second major target audience of stakeholders comprised a wide array of individuals and organizations that are involved with multi-tenant housing across the City.

Stakeholders included:

- Owners and operators of multi-tenant houses
- Tenants
- Tenant service providers
- Housing organizations and providers
- Housing advocacy groups
- Post-secondary institutions and academics
- Sororities and Fraternities
- Students
- Residents Associations

How We Notified and Informed the Community (Communication Channels)

To maximize reach, a variety of communication channels were used to announce opportunities to participate in the engagement process and to solicit feedback. A copy of communication materials including meeting notices, newspaper ads and social media posts can be found in **Appendix F**.

- Email campaigns
  - Targeted email invitations to specific stakeholders
  - Email notices/newsletters issued independently by third parties such as stakeholder groups and Councillors' offices.
- Webpage
  - Official multi-tenant housing review project webpage (http://toronto.ca/MTHreview)
- Social media
  - Multiple City of Toronto Twitter accounts (e.g GetInvolvedTO and CityPlanTO)
- Traditional media
  - Media Release (https://www.toronto.ca/news/public-invited-to-provide-feedback-on-proposed-city-of-toronto-regulations-for-multi-tenant-houses/)
  - Public meeting notices published in newspapers including The Toronto Star and Metroland
- City of Toronto public meeting notices
  - Posted digitally on the project webpage, and City of Toronto social media accounts
  - Mailed to owners/operators and tenants of 386 licensed multi-tenant houses, and included the owners/operators of personal care multi-tenant houses
- Word-of-mouth

Materials were also produced to educate and provide more information to community members. An overview presentation was developed to provide detailed information about the components of the proposed framework and implementation plan. An information sheet was developed to provide a highlight of the proposed framework, project context and ways to participate and share feedback. A copy of the overview presentation can be found in **Appendix G**. A copy of the information sheet can be found in **Appendix H.**

How We Reduced Barriers to Participation

LURA took steps to enhance accessibility for participation in the consultation process. All virtual meetings had a call-in number for community members to participate in the meeting through their telephone only (including landlines). Call-in participants had the same option to raise their virtual hand and ask questions in real-time as participants joining by computer or smartphone.

To reach community members with limited access to the internet, the feedback form was made available through telephone. This allowed participants to call a phone number, that was published on engagement materials, and then complete the questionnaire over the phone using voice or key commands. The phone questionnaire also included pre-recorded audio descriptions to provide background information and context related to each question. When requested, hard copy questionnaires were sent by mail.

3. What We Heard

This section summarizes the main themes and issues raised by participants throughout the engagement process across the four components of the framework as well as implementation and community engagement. It aggregates points heard from the public and stakeholders throughout all engagement activities, across geographic areas of the city and across stakeholder sectors. This section also presents insights contextually unique to individual stakeholder groups and geographic areas of the city.

Summary of Feedback by Framework Component and Theme

Enhanced Operator Licensing Requirements to Promote Health and Safety

Proposed Definition of Multi-Tenant House

Many participants, across several engagement activities, indicated that the proposed definition was clear. However, there were several questions raised around distinguishing between a multi-tenant house and other forms of housing such as group homes, single housekeeping units, student dormitories, campus co-ops and condominium units to name a few. Some suggested considerations to improve the proposed definition included:

- More clarification around a common understanding of the term 'dwelling room'.
- The use of the word 'may' was questioned, stating that it adds to ambiguity of the definition and leaves room for landlords to not provide a minimum number of amenities like cooking facilities and bathrooms.
- Clearly include what is and is not required.
- Minimum number of amenities included in the building per unit or tenant.
- Clarify that tenants are paying rent for a room with shared spaces and not a building.
- Tenants are on individual leases and renting with others unrelated (as opposed to a family).
- Include minimum size for a room (i.e. square footage), number of tenants per room and minimum number of bathrooms.
- Include the number of tenants instead of the number of rooms.
- Use terminology similar to rental apartment units and indicate it is not a self-contained unit.
- Include what it is not, such as - not a hotel, motel, inn, bed and breakfast, private club, tourist home, guest house, short term Airbnb rental and does not function as a single housekeeping unit.
- Use plain language such as - individuals are renting rooms and sharing other facilities such as washrooms, laundry, cooking and common areas with other tenants in the same building.
- Provide examples of building types and include affordability of housing.

Personal Care Multi-Tenant House Standards

Many personal care multi-tenant operators raised concerns with the proposed requirements including:
- Costs associated with hiring a registered dietician to conduct annual reviews,
- Changes to the written care agreements,
- Training and qualification for operators and persons-in-charge.

It was expressed that the already increasing costs of operations would be further exacerbated with increased standards. Participants expressed a willingness to comply with the new standards but also recommended that the City partner with operators to help cut down their costs for meeting the compliance requirements. Some participants raised concerns around achieving and complying with the requirements and were fearful that creating challenges to comply may restrict this type of housing. It was stated that there is a need for more housing like this and the requirements should not be a barrier to operation.

It was also noted that many personal care homes are managed by new immigrants with nursing experience rather than education obtained in Canada. These homes provide quality services and staff, particularly newcomers, and should not be penalized through the new requirements. Several participants, across various engagement activities, suggested that personal care homes not be grouped in with the discussion on multi-tenant houses but rather it should be considered as an extension of the city's long-term care facilities program.

Floor Plans
Many participants stated that this requirement would have positive impacts on safety for tenants and that illegal and unsafe rooms would potentially be reduced. This requirement could also improve landlord/owner accountability and transparency. Many other participants expressed concerns that a floor plan requirement would pose barriers to creating new housing or maintaining this type of needed affordable housing. Many were concerned with tenant rights and affordability. Some owners might find this too onerous and may either evade this requirement or cease operation. It was suggested that this process should not be lengthy.

Suggested details for floor plans included fire exits, smoke detectors, windows in units, minimum room size, ratio of units to shared facilities, usable outdoor space, waste facilities, laundry facilities and other safety features. Many said that this requirement should be accompanied by an inspection to ensure compliance and accuracy. Inspections could be done randomly or be accompanied by other requirements such as fire and electrical inspections. Some commented on the frequency that these plans should be submitted. Suggestions on frequency included, annually, whenever a change to the layout is proposed or made, when a permit is in process, and as part of the licencing of the building.

Many participants were not convinced that this requirement would be enforced. Some questioned whether the City has resources to sufficiently enforce this requirement and shared that, without enforcement through inspections and penalties, this requirement would not make any impact. It was suggested that it could be integrated into the permitting process. It was also suggested that guidelines and/or assistance for creating floorplans would be important for compliance.

Some shared the opinion that the number of rooms on a floorplan would not necessarily provide an accurate picture of the number of people residing in the building; multiple people may be living in a dwelling room, some may not be occupying an official dwelling room at all (e.g. hallways and closets). Some said that multi-tenant houses should be held to the same standards as any other residential building type. Others said that, as a business, multi-tenant houses should comply with any regulations that businesses have.

Zoning and Building Permit Review

The responsibility of zoning and building permit review was discussed significantly by participants. Some indicated that it is the property owners responsibility, others noted it should be covered within the City's zoning by-laws and others indicated it was the builders responsibility only.

Some expressed concern with the costs associated with this requirement being passed on to tenants or leading to tenant displacement and property closures. Participants noted the importance for incentives and subsidies to ensure compliance. It was also suggested that this should also be required for insurance purposes.

Most operators who provided feedback indicated that the recommendation was not clear and more information is needed. Some community members suggested that a requirement for consultation with tenants, tenant unions and tenant organizations be included. It was also noted that renovations of any kind may impact tenant occupancy and create disruptions. Participants expressed concern for operators evicting tenants during this process and increasing rents once renovations are complete (i.e. renovictions). It was suggested that notices for renovations be provided in a timely manner and approaches to ensure tenants can return to their units be included.

Electrical Inspection

Many participants supported the requirement of electrical inspections and noted it could help address concerns around energy use, deterioration of the home, tenant health safety and overall well-being. Some participants expressed concerns around additional costs for operators, the potential for costs to be passed on to tenants and invasion of privacy for tenants and operators. It was noted that this requirement could create barriers to creating and maintaining affordable housing.

Many participants questioned the number of rooms or tenants and wanted to better understand why there is a distinction. Some inquired about how the number (10) was determined and why it was not less or all multi-tenant houses. Some also questioned why the type of building or size mattered. Some indicated that enforcement was an important component but questioned the city's capacity to provide enforcement. While some commented that all housing should uphold to the same standards and have the same safety requirements, others noted that this requirement should not apply to homeowners whos principal resident is the multi-tenant house.

It was suggested that all applicants for new licenses should be required to undertake an electrical inspection by licensed contractors and maintain logs of service conducted on the electrical system annually. It was suggested that reports of inspections be provided and reviewed with tenants and operators. Some participants indicated that guidance is needed and suggested that an information guide be produced. It was also suggested to review the processes in New Brunswick, where laws surrounding the role of electrical inspections exist and are successful.

Property Maintenance Plans

Many participants indicated support for the inclusion of property maintenance plans while a few others noted that this is not a requirement for other forms of housing. Those who were unsupportive indicated that this requirement, for renters and not homeowners, assumes poor maintenance standards and does not comply with a human rights approach to housing and equitable standards. Others who were supportive indicated that this requirement is used in other forms of housing in both required and voluntary capacities. Examples included city run shelters and apartment property managers who often

use tracking system for internal purposes. Many shared that this requirement could improve accountability, increase responsibility of property owner, provide improved conditions for tenants and neighbourhoods.

Many participants expressed concerns with the city's ability for enforcement and questioned if inspections will take place to ensure maintenance plans are upheld. It was recommended that non-compliance be enforced with fines and penalties. It was also recommended that this requirement prioritize safety and cleanliness and ensure clear, sustainable procedures. Some stated the importance of providing clear guidelines, templates and resources for creating property maintenance plans. It was also suggested that waste management, lawn care, and snow removal are important components.

Record of Number of Tenants
Many participants supported providing a record of number of tenants and indicated that it could help manage overcrowding issues and accountability for operators and tenants. Some suggested that numbers and names be provided and included in property tax forms, however others expressed concerns for providing documentation that included personal information because of privacy and discriminatory concerns (i.e. undocumented or without status individuals). A few suggested that the number of tenants allowed in one dwelling room should be set by the city in advance and that the collection of this information should be considered only when there are substantial complaints or infractions to annual inspections as a probationary process.

Some participants expressed concern with the accuracy of information that may be provided and questioned how the numbers of guests and visitors would be included. A few disagreed with the requirement and stated that there are already existing requirements that overlap with this effort. Several participants commented on how often a report of the number of tenants should be made. Suggestions ranged from annually, bi-annually, quarterly and whenever tenancy changed. It was noted that high tenant turn-over could impact the frequency of reporting and would be important to define.

A few participants stated that the reporting of tenant numbers would help to provide services in the area such as schools, the demand for and supply of electricity and water, as well as parking spaces, and other amenities which should be proportional to the number of tenants.

An Enforcement and Compliance Program
Many participants raised concerns that the City may not be able to enforce all the relevant by-laws and licensing requirements proposed which may lead to an increase in the number of illegal multi-tenant houses across the city. This included concerns with getting access to illegal non-compliant properties, capacity to address concerns raised by communities and equitably enforcing tenants and operators who may be negligent. Additionally, it was noted that some operators may have multiple properties and not live on site, which can create challenges establishing contact with the appropriate parties, should issues arise. A few participants considered enforcement measures to be the most critical piece to the proposed changes and maintained that without the proper enforcement this initiative can fail. Participants encouraged the City to study the implications of the proposed changes before implementation. It was suggested that the city should require a license for tenants and operators, to ensure tenant compliance of rules and regulations as well as punishments with fines if they do not comply.

A few respondents, including tenants, operators and housing advocates, were concerned about providing documentation to the city pertaining to tenant and operator personal information. It was

noted that some tenants and operators may be undocumented or without status and the proposed framework should not create a system of exposure which may increase tenant vulnerability.

Education and Outreach

Many participants, across various engagement activities, were supportive of education and outreach materials such as an operators' guidebook, clear information on how to report an issue/complaint and information sheet (including highlights of rights and responsibilities and how to report issues). Many participants also suggested a phone number to speak to someone directly as well as a central web-portal and app to access information. Pertinent information suggested to provide and/or collect includes, issues and compliance reporting process, negligent landlord and tenant identification, lease standards with financial rights, how to handle disputes and process for managing rules and responsibilities that are not upheld by both tenants and operators.

Some participants noted equal responsibilities for tenants and operators in maintaining and upholding compliance standards and the need for guidance to be provided to both parties. It was suggested that tenants and operators are provided with training and educational modules regarding the new framework as well as clear, accessible, guidance in various communication forms. Communication can be provided in the form of bus shelter ads, print materials in common areas of buildings, digital materials available on a centralized webpage and app. It was noted to include direct contact information for follow-up with city departments as well as legal and community services.

A few participants indicated that community engagement is a key factor in ensuring tenants, operators and community members are made aware of compliance and enforcement guidelines. Some suggested annual workshops in each ward, community discussions and stakeholder meetings. It was also suggested to form partnerships across the city to ensure success of the proposed approaches. This could include a committee of city officials, owners, tenants and community organizations to discuss and streamline enforcement guidelines and complaint processes.

City-Wide Zoning

The overall concept of a city-wide zoning approach for multi-tenant housing was supported by many across several engagement activities. However, many others were unsupportive of this type of housing in their communities. Some noted that this form of housing could increase the affordable housing stock across the city and would help ensure the safety, health and overall well-being of tenants. Some were hopeful that the framework would assist in managing issues and concerns with illegal multi-tenant houses, while others were concerned that issues may increase and impact infrastructure and communities negatively.

City-wide Concerns

Several participants raised concerns about the potential influx of multi-tenant houses in particular areas that may result from the proposed city-wide zoning. Many participants expressed concerns with current illegal multi-tenant houses in their communities, particularly North York and Scarborough. Participants expressed the need for equitable distribution of multi-tenant houses throughout the city. Some expressed that a city-wide approach is too general and should be ward by ward specific to reflect community differences. This was particularly noted for downtown neighbourhoods as well as areas surrounding universities. Participants suggested that city staff develop an approach to prevent a high congregation of multi-tenant houses to operate in one area. A few suggested that a city-wide approach

be conducted as a pilot project for 1-year, monitored by a citizen group and reported back on to city staff.

Number of Dwelling Rooms

There were many questions raised about the proposed maximum number of dwelling rooms included in the proposed framework. Some participants indicated that six dwelling rooms was too high while others indicated it was too low. Many participants had concerns with the continued operation of larger legal multi-tenant houses and the tenants they provide homes to. It was recommended that city staff consider the minimum square footage per room, a minimum number of kitchens and bathrooms, and the square footage of the building.

It was expressed that a city-wide zoning approach ignores the unique built form characteristics of Toronto neighbourhoods and the framework should include one set of regulations for areas where multi-tenant houses are currently operating legally and another set for areas where they are not currently permitted. Another idea was to look into site-specific re-zoning to allow good, quality, affordable housing in places where the properties can be accommodated. It was advised that some buildings are not appropriate to operate as multi-tenant houses such as townhouses and semi-detached houses, because they may not accommodate waste disposal for multiple tenants.

Parking

There was both support and opposition for the proposed parking rates across multiple engagement activities. Some expressed that the minimum proposed number (zero or two dependent on location), was not enough, others noted the numbers made sense and others didn't have an opinion. Several participants particularly noted the difficulty in suburb communities of the city (i.e. North York and Scarborough) to be able to accommodate parking within property boundaries and the inability to use on-street parking as it is not permitted. It was suggested that the density ratio of dwelling room tenants to parking spaces must be carefully balanced to prevent overcrowding but also to take into account tenants who may not own a vehicle by choice or circumstance.

When discussing properties that were close to transit, many participants expressed concern for not having a minimum parking space proposed. It was noted that this will be difficult for tenants to support functions that may not be able to be completed on transit like moving, visitors, deliveries and renting a car. Some participants, including students driving to classes, noted that multi-tenant properties may have more than two vehicles and questioned what parking arrangements would be best suited for these tenants. Some questioned what the actual distance was to define 'close to transit'. It was suggested that properties close to transit be offered on-street parking permits. However, concerns were raised about parking rates creating barriers for neighbours of multi-tenant houses to access available parking options and acquire parking permits. It was also suggested that indoor or backyard bike parking be required for each property.

Initiatives to Support Tenants and Maintain Affordability of Housing

Supports for Landlords/Operators

Many participants expressed concern for high costs involved with bringing properties into full compliance with the proposed by-law requirements, and the potential limitation of any incentive program to adequately support operators in a substantial way. Participants encouraged City staff to

proactively work at establishing relationships with financial institutions and lenders to create loans and financing options for operators.

Supports for Tenants

Many participants, across several engagement activities, expressed the importance for supports for tenants of multi-tenant houses. It was noted that having access to a central webpage is helpful with information that is clear, simple and available in multiple languages. Language barriers are often perceived as "hiding tactics" or mechanisms to evade responsibility/accountability to applicable by-laws and legislation. A dedicated phone line was also discussed, and participants indicated that it should be available 24/7, in multiple language with the ability to connect to someone live or have someone respond in a timely manner.

Participants also discussed the production of an information guide. It was noted that a guide can include items like who to contact, how to relocate, what monetary supports are available and assurance that tenants will be supported if an incident is reported. Several residents mentioned that digital and print materials are equally important as well posters in common areas. Social media was noted as a substantial resource for tenants including Facebook, Instagram and Twitter.

When asked about additional ideas to support tenants in cases of emergencies, many participants indicated that a Relocation Support Program/Emergency Response Protocol, including housing allowances should be developed. This was noted as a plan for temporary housing to be established by city staff and supported by social service agency partnerships. This was suggested to include first and last months rent, rent supplements, and quick access to appropriate permanent housing. This could also include funds for moving cost, transportation, items lost and food. The fees were suggested to be covered by the operator if the incident is deemed to be at their fault. Some participants suggested an emergency fund be established to collect a small monthly amount paid by tenants and operators and set aside for emergency situations. Many residents also indicated that guidelines are needed to outline the steps of relocation as well as, where tenants will be located, when tenants might return, what will happen to possessions lost and how tenants will be provided for in the interim.

Some participants also noted that access to physical and mental health supports would be valuable to tenants in emergency situations. It was suggested that operators and tenants receive training to handle situations related to fire and evacuations.

A few tenants expressed experiences and concerns related to landlord misconduct and suggested that rent controls to maintain affordability and lease controls to avoid being coerced into paying additional fees is needed.

Supports for Community Members

Some participants expressed concerns about multi-tenant houses in their neighbourhoods due to issues related to waste disposal, noise, health and safety. Community members wanted to understand the rights that neighbours are entitled to when living next to poorly maintained multi-tenant houses. Participants expressed frustration with operators and tenants that remain disrespectful to neighbourhoods and stressed the need for a more robust and less cumbersome system of reporting complaints. A few participants were particularly interested in being provided with more information about community member rights and who to contact.

Implementation

Participants expressed both support and opposition for the proposed implementation plan. Some participants expressed concerns that it may result in an increase in homelessness across the city (and may also disproportionately impact minority groups). Some participants expressed optimism that with well-designed strategies in place to develop support systems and by maintaining a collaborative approach, the implementation can be successful.

A few participants suggested that the proposed phasing of the implementation plan be reversed. Participants noted that the licensing of new multi-tenant housing should be a priority to help increase the affordable housing stock, and that bringing existing operators into compliance can happen simultaneously, but as a secondary priority.

Many participants expressed concern for displacement of tenants as a result of the implementation of the proposed framework. It was suggested that a zero-displacement approach be implemented, where the City can work with the operators to continue their operations. This could include the City providing alternative housing for displaced tenants or assisting operators with compliance through resources provided by the City. It was also suggested to provide housing allowances in cases where unanticipated displacement occurs.

Community Engagement

Participants commented on and asked questions about previous consultations about multi-tenant housing that took place since 2015 including the Rooming House Review and Rooming House Pilot Project. Some participants expressed hesitation that this engagement process will be different from previous projects and questioned if changes will be made.

Additionally, a few participants expressed concern with the timeline of the engagement process for the current proposed framework and noted that there should be more time allotted to collect feedback. A couple of residents noted that more public notification and general public information needed to be provided to communities to gather feedback.

Summary of Feedback by Stakeholder Group and Geographic Location

Tenants of Multi-Tenant Houses

Participants highlighted the costs to compliance as a factor that needs important consideration as these costs may be passed on to tenants. Additional cost concerns were raised about insurance as tenants might be asked to pay for insurance as part of the rent. It was suggested that there is a need for an accessible and affordable third-party insurer to support tenants.

Participants expressed concerns for overcrowding resulting from condo owners renting out bedrooms, living rooms, and dinning room as separate rooms. A suggestion was made that the zoning should be based on square footage and not number of rooms.

Displacement and eviction were also discussed and raised as a major concern. Participants expressed that any application for work on a multi-tenant houses should include proper requirements for tenant eviction, if required. It is important to ensure that tenants are not evicted for renovation work. It is also

important to ensure that the building permit is issued prior to the notice of termination to tenants. It was noted that tenant dignity and privacy must be upheld and consideration should be made about the collection of personal information when incidents are reported.

Landlord accountability was discussed, and it was noted that landlords are not currently complying with building permit requirements and that the frequency of inspection visits from by-law personnel should be increased to ensure the requirements are being followed and the safety of tenants is not compromised. However, participants also noted concerns with surprise inspections. It was suggested that tenants should receive at least 24 hours notice of any inspection or maintenance work.

Resources, education and information for tenants should be made available both in digital forms as well as physical handouts. It was suggested that legal clinics and local political offices should be involved in the tenant outreach and awareness. It was further noted that wrap-around supports should be included as part of the tenant resource with information including:
- How to access social workers for various needs;
- Mental health supports and services; and
- Supports available for tenants with hoarding issues.

Operators of Multi-Tenant Houses

Participants raised questions and concerns about the maximum number of rooms proposed. It was suggested that room size be considered as opposed to room numbers as well as common areas provided. Concerns were also noted about the potential for displacement of tenants as an unintended consequence of the proposed framework. It was noted that operators may not be able to sustain profitability due to new licensing requirements and may decide to sell their properties. Participants noted how the COVID-19 pandemic has negatively affected the ability of operators to sustain their operations. Some of these operators have lost their businesses as they have struggled to comply with certain conditions placed upon them.

Some operators suggested that incentives can help to keep rents down, provide people with housing stability and protect rooming housing stock as a necessary affordable housing option. Examples were provided such as fee exemptions and tax forgiveness. It was suggested that the implementation focus should not be to legalize what currently exists as illegal multi-tenant housing, but to make all communities, especially the suburban areas that don't have a path to legalization, function better than before for the benefit of all, as a result of this framework. It was also suggested that funds should be provided to help with improving accessibility standards to properties.

Participants indicated that they like that the proposed compliance and enforcement program is intended to be fair and transparent. It was noted that there is a need for uniformity in the way inspections are done. Participants noted concerns with the proposed parking rates associated with the City-wide zoning strategy. This included concerns for the lack of on-street parking and having or making space on properties for parking.

Participants provided suggestions related to supports for operators including education for operators to understand what the standards are and what will be involved in meeting them.

Students

Most online and telephone questionnaire respondents who identified as students, were unsupportive of the proposed maximum number of rooms, city-wide approach to zoning and parking requirements. However, many student respondents through DIY Workshops and stakeholder meetings noted support for those same requirements. It was suggested that one sanitary facility should be required for every three rooms as opposed to four. Across various engagement activities, some student participants were uncertain how they would be impacted by the proposed parking rates and needed more clarity about definitions for single housekeeping units, dwelling rooms. Some students indicated support for trainings for operators, standards for sanitation, and proposed standards outlined for personal-care multi-tenant houses.

Floor plans and electrical inspections were said to be necessary for health and safety. Electrical inspections were noted to address concerns around energy use, deterioration of the home and tenant health and safety. It was suggested that the city review New Brunswick by-laws surrounding the role of electrical inspections. A key issue is pest and waste management, and students were hopeful that requirements will address these concerns. Students discussed the importance of house rules in maintaining a peaceful, well kept, quiet home environment.

Participants noted concerns about invasion of privacy for tenants and operators. It was suggested that consideration for the collection of personal information be incorporated into the development of the framework requirements. Concerns were also raised about fees being passed on to tenants. It was suggested that more transparency is needed about collecting fees. Several concerns were raised with students not being able to deal with emergency situations because many students can't afford tenant insurance and noted it was an important safety net for the city to provide.

Education and awareness were highlighted as critical components to the success of the proposed framework. It was suggested that information should be easy to understand, accessible and available in multiple languages to benefit people who are coming from other countries. Both digital and print materials were noted important accessibility factors. Transparency was also an important component and it was noted that rent controls and lease controls that outline rights and responsibilities are key. Some participants identified a need for improved access to organizations that can advocate for student as well as improved forms of legal education.

Housing/Tenant Organizations, Service Providers and Advocates

Participants appreciated the proposed changes to and saw value in bringing consistency in the way regulations and by-laws will be applied as well as the emphasis being laid on tenant safety, dignity and well-being. Participants noted concerns about the potential for increased costs, especially for non-profit operators to meet the requirements. Licensing fees, particularly for non-profit organizations, could be a challenge as some may not have extra funds to sustain these costs. Participants emphasized that the City should allow houses that offer affordable, well-maintained housing, even those with more than 6 rooms, to continue operating.

Overall, participants were in support of the city-wide expansion of the multi-tenant housing but also did raise some concerns with the existing multi-tenant houses with more than 6 rooms. Participants noted that multi-tenant houses where students are housed often contain more than 6 rooms and thus there is a potential for implications for students, as well as operators, if the framework includes 6 units as a standard. Participants noted tenant displacement as a major concern and emphasized that a plan needs to be put in place to deal with mass displacement of tenants. An example of a tenant emergency relocation plan was provided. Incentives for operators will be necessary but also the availability and accessibility of supports (including housing) for displaced tenants will be needed. Participants also emphasized the need for creating educational resources for tenants, and in particular, students, with contact details available for City staff that can be contacted in the case of operators not meeting the compliance requirements or where evictions occur.

Participants cautioned the City on the fact that tenants, especially those housed in personal care facilities, are very vulnerable and may end up being displaced if the by-law requirements cannot be met and houses are shut down. It was further noted that the supportive housing sector has a limited ability to absorb additional tenants especially those with concurrent disorders and other mental health conditions. If people are de-housed the City would need to come up with a strategy to deal with the situation such that people can attain decent housing quickly.

Participants agreed on the need for enforcement components and keeping operators accountable on tenant safety and well-being. Participants emphasized the need to streamline the process on zoning and building permit review to avoid uncertainty that tenants may have to face as well as possible increase in costs for the operators. Keeping the costs low would be necessary in order for the fees not to be passed on to tenants. Participants expressed concerns and confusion with how the by-laws are interpreted and implemented by fire inspectors and building inspectors. It was suggested that the amount of administration should be reduced and efforts should be made to make the process simple. Participants further noted that two parking spots can be a barrier for operators. Participants also wanted the City to remain cognisant of the contexts of different neighbourhoods when implementing the parking requirement.

Participants expressed both support and opposition for the proposed implementation plan. Some participants expressed some concern toward the implementation plan in how it may result in an increase in homelessness across the city (and may also disproportionately impact minority groups). Some participants expressed optimism that with well-designed strategies in place to develop support systems and by maintaining a collaborative approach, the implementation can be successful. Participants recommended that the two phases should take place simultaneously rather than one following the other.

Residents Associations

Resident association participants expressed lack of trust and uncertainty for the City's capacity to be able to keep operators and tenants accountable for the proposed licensing requirements. Concerns were raised that the City may not be able to enforce all the relevant by-laws and licensing requirements which may lead to an increase in the number of illegal multi-tenant houses across the city. Participants considered enforcement measures to be the most critical piece to the proposed changes and

maintained that without the proper enforcement this initiative can fail. Participants also discussed community issues pertaining to property management, illegal parking, health and safety concerns.

Participants expressed concerns with city-wide expansion of multi-tenant houses without the regard for the character of each neighbourhood and the proposed six dwelling rooms allowed to operate is too high and would a substantial increase in certain areas and may negatively impact neighbourhoods. Participants noted that changes will impact neighbourhoods and community members in different ways. Concerns were discussed pertaining to the concentration of multi-tenant houses in certain neighbourhoods and increase in illegal multi-tenant houses as a direct result of city-wide expansion. It was suggested that the proposed framework have different rules and regulations for areas of the city where multi-tenant houses is legal and areas where multi-tenant houses are not permitted.

Some participants expressed serious concerns for the health and safety of tenants in illegal multi-tenant housing, including those in North York, Scarborough and students near universities living in cramped living quarters. Some participants were concerned about tenant well-being, particularly for female tenants, and wanted the City to consider the safety elements. Waste disposal was discussed, and several participants indicated that it was a major concern in their communities. It was suggested that waste disposal remain within the property, so neighbourhoods are not filled with an over abundance of waste.

A suggestion was made that the multi-tenant houses should be the operator's principal residence in order to limit one landlord from operating multiple properties. One participant also stated that incentives may not be effective and can lead to an increase in illegal multi-tenant houses. Regarding parking, it was suggested that six dwelling room tenants in one property would need access to two parking spaces to support moving, visitors, deliveries and other needs that cannot be met by transit.

Participants wanted reassurance that the City's proposed budget that will be presented to Council matches the realities of what is taking place on ground. As the project progresses, it was suggested that the city research other cities around the world where multi-tenant houses have been successful. It was suggested that a committee be formed to discuss and consider the impact of the framework and whether it can be successful and applied city-wide. Further consultation events should take place to demonstrate how the proposal has been modified to incorporate feedback provided during this engagement process.

Sororities and Fraternities

The Sorority and Fraternity Association of Toronto (SoFra) Federation executives represent the not-for-profit alumni / associations that own all nineteen (19) nationally and internationally chartered sororities and fraternities with Chapter Houses in the City of Toronto. SoFra participants expressed that they do not fall under multi-tenant housing as they are single housekeeping units existing as private residences. SoFra houses are not rental properties and are not governed by the Residential Tenancies Act. They do not operate as a business entity but only exist to serve the membership. From a zoning perspective, the houses are well-established.

Participants noted that SoFRA houses should be grandfathered into any new zoning regulations. From a licensing perspective, if neighbours have issues with SoFra houses (e.g., noise, waste disposal, weeds, etc.) they can call 311 and if there does exist any evidence Municipal Licensing and Standards can take action to enforce the relevant by-laws. If the City is proposing to include SoFra houses under the new framework, SoFra intends to appeal the decision. This change could result in hundreds of SoFra

members forced out of their residences and becoming homeless which can exacerbate the homelessness crisis.

Toronto

Participants from Toronto raised concerns about a city-wide zoning approach and impacts of changes on existing multi-tenant houses, especially properties with more than six rooms. Many concerns were raised about the potential negative impact the requirements may have on the affordable housing stock and displacement of tenants. However, most respondents through the online and telephone questionnaire, who identified as living in Toronto were supportive and did not have concerns about a city-wide zoning approach. A few participants discussed the need to develop an approach to limit the number of multi-tenant houses that can be developed in one area.

North York

Many respondents through the online and telephone questionnaire, who identified as living in North York were supportive of the proposed definition, zoning and building permit, electrical inspection, property maintenance plans and parking requirements. Respondents were mostly unsupportive and/or raised concerns about a city-wide zoning approach and the proposed maximum number of rooms. Participants noted that there could be some confusion around the definition of multi-tenant housing as it applies to areas where they are not currently permitted due to similarities of other forms of housing.

Etobicoke

Many respondents through the online and telephone questionnaire who identified as living in Etobicoke were supportive the proposed definition, zoning and building permit, electrical inspection, property maintenance plans, proposed maximum number of rooms and parking requirements. Respondents were mostly unsupportive and/or raised concerns about a city-wide zoning approach.

Scarborough

Many respondents through the online and telephone questionnaire who identified as living in Scarborough were supportive of the proposed definition, zoning and building permit, electrical inspection, property maintenance plans and parking requirements. Respondents were mostly unsupportive and/or raised concerns about a city-wide zoning approach and the proposed maximum number of rooms. Many participants raised concerns about the impact on neighbourhoods, infrastructure, and parking. It was specifically noted that providing parking space within property boundaries would be a major concern. It was suggested that parking rates could be a negotiated item as it may take away from a properties greenspace and be less of a priority for some operators and/or tenants.

4. Next Steps

LURA Consulting prepared this final engagement summary report to provide to City staff. The consultation results will form part of a final Staff Report to the Planning and Housing Committee and Council in mid-2021. This will include recommended zoning by-law amendments and new licensing by-law for multi-tenant houses.