



Federation of  
South Toronto  
**RESIDENTS'**  
**ASSOCIATIONS**

June 18<sup>th</sup>, 2021

Dear Planning and Housing Committee members,

**RE: Public Meeting of the Planning and Housing Committee on 28 June 2021, concerning the proposed zoning bylaw to permit multi-tenant houses (commonly known as rooming houses) throughout the City of Toronto.**

The Federation of South Toronto Residents Associations (FoSTRA) applauds the initiative to integrate all the amalgamated City of Toronto under one multi-tenant-housing bylaw. We also commend the effort to gain control of the proliferation of unregulated rooming houses. We believe that it is much better to license and regulate these 'rooming houses,' rather than allow them to secretly spread in all areas of the City. Generally, we approve of the plans and support the proposed human rights approach.

FoSTRA does have reservations about the speed of this bylaw's approval. After attending both consultations, FoSTRA's Chair and Vice-chair feel that not enough time, effort and resources have been allocated to make for a successful implementation of the bylaw.

First, these consultations seemed to be less about listening to community members and making changes to address the problems raised, than to complete steps in the consultation process.

Second, the City is not a single built form, nor a homogeneous community. Assuredly, there are houses, but what about large condo units in towers rented out to many workers or students? An attached three-floor rooming house in downtown Toronto is not the same as a bungalow in Scarborough. The City is also made up of different and sometimes unique communities. 'Rooming houses' in one area are unlike those in others – with different kinds of tenants and different kinds of neighborhoods. Will a one-size bylaw fit all? Has it been tested?

Third, in the areas of the City where multi-tenant houses are currently allowed, enforcement resources and empowerment are woefully inadequate. Under current regulations, most 'rooming houses' are already secretly run and illegal. One only has to enter an ordinary-looking house downtown to discover mattresses on the floor in attics and closets to realize that enforcement is insufficient. Student housing is notoriously unregulated around colleges and universities...how will such operations be discovered in a greatly expanded territory? How will bylaw officers manage to enforce a city-wide bylaw?



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At no time did the attendees hear how the proposed staffing levels will address the expected caseload, nor how changes to existing bylaws will empower enforcement officers to gain entry to inspect premises under suspicion of violation.

Additionally, the consequences that are envisioned for those who violate the guidelines needs to be clearly articulated so that stakeholders can gain confidence that the proposed program will be truly effective in dealing with these rogue operations.

Fourth, an education program for MTH landlords, and especially tenants, has to be developed and become well known to everyone through an extensive media campaign. Is this campaign prepared and ready to be launched?

The ultimate goal of this bylaw is to establish safe, healthy, affordable housing for a diverse population – tenants who would otherwise be un-housed or homeless. If the new regime results in the withdrawal of the most affordable if unsafe housing, we could make homelessness worse. On the other hand, in the expanded areas under control, multi-tenant housing must be well integrated into each community.

FoSTRA is asking that more time, effort and resources be allocated to get this bylaw and the enforcement plan right before it is submitted.

Sincerely,

**Chair**

Rick Green

**Vice-Chair**

Don Young