



18 June, 2021

Planning and Housing Committee (plc@toronto.ca)
10th Floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

RE: Multi-Tenant Housing Review, Planning & Housing Committee, June 28, 2021

Dear Committee Members:

The Cliffcrest Scarborough Village SW Residents Association (CSVSWRA) is an incorporated not-for-profit association representing the residents of these neighbourhoods.

This community is a **long established suburban**, as opposed to urban, community which supports a rich ecological residential area. Rooming houses were not approved in Scarborough because they were perceived not to have a fit with many family oriented communities. Without consultation with our community members or Ward, we fear unintended consequences of a **blanket or universal implementation** of multi-tenant houses (MTH) in conjunction with the additional introduction of **Garden Suites**. These two changes, if implemented, suddenly and simultaneously will have a dramatic change to the existing character of our neighbourhoods.

The system we create to provide future **affordable housing** must be **user-need centred** as well as respectful to the citizens who this change will be imposed on. It needs to be prototyped at scale in several neighbourhoods and evaluated. A policy shift like this is very difficult, if not impossible to reverse. A blanket city-wide rollout of this change without a pilot and full assessment of the policy, enforcement, and impacts of this decision will create significant harm to neighbourhoods.

We are supportive, **in principle**, of harmonizing the regulatory framework and zoning standards for MTH in the City of Toronto. We agree that improved regulatory standards, inspections procedures and enforcement procedures are required to improve the living conditions and safety for residents in these houses. This is critical given that the current system is know to be ineffective,

We endorse your proposal to first ensure existing operators, including licensed, unlicensed and illegal MTHs, are all in compliance, before moving to the second phase which would allow for new operators to apply for licenses.

Based on the experience of our members with illegal and unlicensed MTHS, we have **serious concerns with both the implementation process and the City's ability to properly enforce these houses**. These houses present real and potential safety issues for the tenants, many of whom may not be able to advocate for better housing themselves.

We have encountered **illegal rooming houses** in our community whereby neighbouring properties have deteriorated from neglect. Garbage has accumulated and attracted foraging wildlife. Parking on the street and lawns has been problematic and questionable activities in the residences has caused us to request police intervention. Unfortunately, the police cannot enter these homes. On some occasions we have been concerned about the safety of our residents, particularly our children. Consequently, **established residents**, particularly **Seniors** who had expected to age in place, have been displaced, no longer feeling comfortable or safe in their neighbourhoods. Seniors nurtured our suburban, welcoming communities and represent a significant percentage of Toronto residents. we can not ignore their considerations.

Hopefully the Committee Members will also consider the **2019 Toronto Resilience Strategy**. It was completed with the input of over 100 reputable Toronto agencies concerned with balancing existing and future development confronting the well documented negative impacts of climate change and growing housing inequities . **Sustainability** for all and future Toronto residents is a major focus.

It is for these reasons that we are recommending for Phase 1 that City Council:

1. **Define criteria** to evaluate the success of Phase 1.
2. **Create a process** to identify existing Rooming Houses across the entire city since you acknowledge that "it is a challenge to establish how many such houses exist across the city".
3. **Commit to increase the budget** for effective and timely management of MTHs and allocate adequate resources (inspection, enforcement, legal staff, etc.) to ensure the success of Phase 1.
4. **Bring existing non-compliant, illegal and unlicensed MTHs into compliance** (or shut them down) – as per your stated Phase 1. Compliance should include fire & safety to code (eg. fire doors, alarms, egress etc), necessary parking capacity and handicap accessibility.
5. **Hold licensing for new MTHs** until non-compliant, illegal and unlicensed MTHs are compliant (or shut down) – as per your stated Phase 2.
6. **Track** and make public quarterly statistical reporting on key performance measurements such as number of homes inspected, violations identified, fines imposed and collected, homes brought into compliance, homes closed, etc.
7. **Institute** a schedule of enforceable financially **imposing escalating fines**, low tolerance for repeat offenders and set clear criteria for reasons to revoke a license.
 - a. This is required to combat the potential for fines to simply be the cost of doing business for a segment of MTH operators. **Fines have to be financially more consequential than the cost of meeting compliance in order to be a deterrent.**

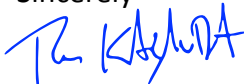
8. Nearing the completion of PHASE 1, an **Evaluation Report should be presented to City Council** to decide next steps including the possibility of accepting appropriately rationed applications for new licenses.

The significant number of non-compliant, illegal and unlicensed (and often unsafe) MTHs in the City is unacceptable. The City must first effectively address the current non-compliant, illegal and unlicensed houses before expanding zoning changes.

To be clear, new MTH licences should not be available until the City has tested and evaluated any proposed system and proved that the system is effective and properly resourced. Otherwise extending the changed zoning to all neighbourhoods will create an exponential problem without proper checks and enforcement in place

We agree with the City's effort to bring MTHs into compliance since they offer an affordable housing option. However, the City must place the safety of tenants first by ensuring that the City can effectively enforce the by-laws.

Sincerely



Tom Kasanda

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Director, President

Cliffcrest Scarborough Village SW Residents Association

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