



Planning and Housing Committee (phc@toronto.ca)

June 24, 2021

RE: Multi-Tenant Housing Review, Planning & Housing Committee, 25.10, June 28, 2021

Deputy Mayor Ana Bailao, Chair and Members, Planning and Housing Committee

The South Armour Heights Residents' Association represents approximately 850 households in the area between Yonge Blvd over to Avenue Road, from the 401 down to Brooke Ave, within Ward 8. Our area is currently not zoned to permit Rooming Houses but we have illegal houses. It has been quite problematic dealing with these situations. We have attended a number of the workshops and we have reviewed in detail the MTH Presentation, the by-law amendments for Zoning, the new proposed Municipal Bylaw, and the staff report.

It is clear that improved regulatory standards, inspections and enforcement are needed to improve the living conditions and safety for residents in these houses. As well, the City needs to ensure that existing operators, including licensed, unlicensed and illegal MTHs, are all in compliance before allowing new operators to apply for licenses.

Based on experiences with many on-going issues with non-compliant, unlicensed and illegal MTHs, we have **serious concerns with both the proposed 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.

The staff report generates Questions that need to be answered before the Planning and Housing Committee and City Council can make responsible decisions regarding the viability of the proposal and budget implications.

We have specific questions:

- Plans for enforcement for non-compliant, unlicensed and illegal houses (including student housing) in both zoned and not-zoned areas of the City between now and Nov 1, 2022 - how can progress be made with these houses if additional budget is not obtained in 2021 and 2022 to hire additional enforcement officers and fire inspectors?
- If MLS does not know the total number of existing rooming houses/rooms across the City, how can a Plan and a Budget be defined?
- What are the expansion plans – what are the house/rooms statistics today? What are your targets for end of Year 2 and end of Year 3?
- It appears that additional budget is NOT being requested as part of this proposal by any of the Departments for 2021, 2022 or 2023. Are all costs for 2021 and early 2022 to be 'absorbed' within existing operating budgets?



- What are the Total Costs across all Departments for Years 1, 2 and 3?
- For this proposal to be successful, it must be guaranteed major budget support from Sept 1, 2021 onwards. A proper Budget projection needs to be prepared. How is the City going to guarantee that the proposal receives the necessary funding through Department budget requests in future years? Why would a cross-department 3 year Budget not be defined for this program?
- Will evaluation criteria and key performance indicators be developed and statistics published quarterly?

Based on the current situation and our Questions, we put the following recommendations forward:

1. In Year 1 define evaluation criteria to evaluate the success of Year 2.
2. In Year 1 identify all existing Rooming Houses across the city (licensed, unlicensed and illegal).
3. Provide sufficient guaranteed budget for Year 1 (improved enforcement must begin now), 2 and 3 to be successful.
4. Bring existing non-compliant, unlicensed and illegal MTHs into compliance within Year 2.
5. Hold licensing for new MTHs until non-compliant, unlicensed and illegal MTHs are compliant – it is anticipated that new applications could be considered in Year 3.
6. Starting in Year 1 provide public quarterly statistical reporting on key performance indicators.
7. In Year 2 initiate a schedule of escalating fines; and set clear criteria for reasons to revoke licenses.
8. Nearing completion of Year 2, present an Evaluation Report to City Council to decide on next steps including the possibility of accepting applications for new licenses.

The significant number of non-compliant, unlicensed and illegal (and often unsafe) MTHs in the City is unacceptable. We strongly recommend that the City first properly deal with the current non-compliant, unlicensed and illegal houses before allowing new applications.

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

Based on the current situation and our questions, we ask the staff report be deferred until City Council has been provided with sufficient information to determine realistic options and the program is adequately financed to successfully ensure safe Multi-Tenant Houses.

Sincerely

Sheila Harrison (Secretary)



South Armour Heights Residents' Association



Website – sahratoronto.com
Email – info@sahratoronto.com

Cc: Mayor John Tory (mayor_tory@toronto.ca)
Giuliana Carbone, Community & Social Services (Giuliana.Carbone@toronto.ca)
Tracey Cook, Infrastructure & Development Services (tracey.cook@toronto.ca)
Carleton Grant, Municipal Licensing & Standards (Carleton.grant@toronto.ca)
Councillor Mike Colle
Gregg Lintern (Gregg.lintern@toronto.ca)
MTHReview@toronto.ca
Geoff Kettel, Cathie Macdonald (FoNTRA)
Jim Sadler, Bob Williams, Gary Langdon (SAHRA)
Upper Avenue Community Association
Bedford Park Residents Organization
Lytton Park Residents' Organization