



June 24, 2021

Planning and Housing Committee (phc@toronto.ca)

Re: Multi-Tenant Housing Review, Planning & Housing Committee - June 28, 2021 meeting – PH25.10

Dear Committee Members:

As the ABC Residents Association, we are writing to the Committee with our concerns about and recommendations for improving the implementation of a harmonized zoning and regulatory framework for Multi-Tenant Houses (MTHs) across all parts of Toronto. In particular, we are mindful of the City's social responsibility and liability to ensure reasonable standards and proper enforcement so that tenants in these homes, many of whom are vulnerable persons, have safe living conditions.

The ABC Residents Association represents residents living in Toronto's Yorkville / North Midtown community between Yonge Street west to Avenue Road and Bloor Street north to the CPR tracks.

It has been disturbing to hear during the MTHs consultation workshops and in other discussions about ongoing non-compliant, unlicensed and illegal MTHs operating in many areas of the City, and the difficulties with enforcement and remediation. Many examples described dangerous and unsafe conditions.

While City officials have acknowledged these problems and a commitment to fix them, we have serious reservations that the proposed new framework and enforcement measures are viable. This includes essential questions such as estimating the number of current and projected MTHs, the need for a comprehensive budget, tracking the number of legal dwelling rooms added as affordable housing stock, and the establishment of evaluation criteria and reporting about the success and challenges of the framework to enable future improvements. The Federation of North Toronto Residents Associations (FoNTRA), of which we are a member, has submitted a list of questions that need to be answered before the Committee and City Council can make responsible decisions about the proposals.

More generally, we have the following recommendations to help ensure the proposed three-year implementation plan is effective in enforcing the MTHs requirements and ensuring these dwellings are in compliance for the benefit of their residents and within their neighbourhoods:

1. In Year 1 define criteria to evaluate the success of Year 2.
2. In Year 1 identify existing MTHs across the entire city.
3. Provide sufficient guaranteed budget for Years 1, 2 and 3 to be successful.
4. Bring existing non-compliant, unlicensed and illegal MTHs into compliance within Year 2.

5. Withhold 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 institute 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 ABC Residents Association supports the intention to bring a harmonized approach for MTHs and greater enforcement resources to help provide safe and affordable housing in Toronto. However, the Committee's consideration should be deferred until the questions raised about implementation and adequate financing are addressed.

Sincerely,

John Caliendo & Ian Carmichael
ABCRA Co-Chairs

Cc: Mayor John Tory and Members of City Council (Clerk@Toronto.ca)
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