

Heathwood Ratepayers Association

24 June, 2021

Planning and Housing Committee

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

Dear Committee Members:

The Heathwood Ratepayers Association represents 1350 single family homes in Ward 22 in the quadrant Kennedy to Birchmount, Steeles to McNicholl. We are concerned about the roll-out of the Multi-Tenant (Rooming) Houses proposal into our area because we do not see how the City will be able to convince the illegal operators to operate to the new standard.

Based on experiences with many on-going issues with non-compliant, unlicensed and illegal MTHs, the City has acknowledged that enhanced regulatory standards, inspections and enforcement are needed to improve the living conditions and safety for residents in these houses. 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.

We have attended consultations on the new program and reviewed the proposed new bylaws and regulations. We are left with many unanswered questions and have **serious concerns with both the proposed implementation process and the City's ability to properly enforce these houses**. The current system is not working and many of these houses present real and potential safety issues for the tenants, many of whom may not be able to advocate for better housing themselves.

For the past 20 years, we have witnessed and reported to ML&S several illegal rooming houses with unsafe and unhealthy conditions. We had little success to close some down and see illegal operators fined but the majority of cases were not even visited by ML&S and are still operating illegally in plain view without enforcement due to lack of resources.

The staff report and recommendations generate a number of 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 the budget implications.

We have specific questions about plans for enforcement between now and Nov 1, 2022. We do not see a formal Budget for Years 1, 2 and 3 within the proposal. What are the total costs across all Departments for Years 1, 2 and 3? How is the City going to guarantee that the proposal receives the necessary funding through Department budget requests in future years? Will evaluation criteria and key performance indicators be developed and statistics published quarterly?

We would ask that the City Council incorporate the following recommendations:

1. In Year 1 define evaluation criteria to evaluate the success of Year 2.
2. In Year 1 identify existing Rooming Houses across the entire city.
3. Provide sufficient guaranteed budget for Year 1, 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 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 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 an affordable 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

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