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July 3, 2022

**RE: PH35.22 A New Regulatory Framework for Multi-Tenant Houses Status Update  
SAHRA's Comments**

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 do have illegal houses.

Improved regulatory standards, inspections and enforcement are needed to improve the living conditions and safety for residents in multi-tenant 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.

Based on the number of directives defined by Council in Oct, 2021 and the depth/breadth of those directives, we understand that these cannot be completed prior to 2023. We are pleased to see that some initial planning work has been completed to date.

We do however have concerns:

1. We would have hoped that work would have been initiated to create/improve a **database** to start collecting data now so that **reporting** would be available to show progress in 2022 as well as 2023 and then on-going once the New Framework is in place. This info is also needed for budgeting.
2. One of the major concerns in 2021 was that the City demonstrate that they can **'get in control'** of non-compliant licenced houses as well as deal with illegal operating units in 2022. We were advised that 2 additional officers would be recruited and trained in 2022 (it was stated that it takes one year to train an officer). The status update states that the 2 additional officers have been employed but we hope that additional officers will be recruited in 2022 to truly make progress with enforcement and licencing of non-licenced operations. Will additional budget be applied to this in 2022 and in 2023, before a New Framework may even come into effect? We want to see the clean-up/catch-up.
3. We are concerned about the Financial Impact statement "It is not expected that other work items will require additional funding. However, if needed City Staff of the relevant divisions will request the funding..." which means budget requests in the 2023 budget year. It sounds as if a **Plan and a comprehensive Budget**, across all involved Departments has not yet been prepared. For the Plan to be prepared, the database needs to provide information on both the licenced and unlicenced houses across the various areas of the City, including predictions of the expansion goals. For this proposal to be successful, it must be guaranteed major budget support.
4. We do not see any mention of developing **evaluation criteria and key performance indicators** and statistics being published quarterly. This is an important prerequisite that should be completed before the initiation of the New Framework.

We would ask that an Interim Status Report be published in October to help the public understand progress being made with dealing with the directives.



*South Armour Heights Residents' Association*



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Respectfully submitted

A handwritten signature in black ink that reads 'S. Dunlop'.

Sheila Dunlop (Secretary)

Copies:

Mayor John Tory

Giuliana Carbone (Community & Social Services)

Tracey Cook (Infrastructure & Development Services)

Carleton Grant, Ginny Adey (Municipal Licensing & Standards)

Councillor Mike Colle, Linda McCarthy

Gregg Lintern, Kyle Knoeck (Planning)

Geoff Kettel, Cathie Macdonald (FoNTRA)

Jim Sadler, Bob Williams, Gary Langdon, Ron Johnson (SAHRA)

Upper Avenue Community Association

Bedford Park Residents Organization

Lytton Park Residents' Organization