



July 4, 2022

Toronto City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2  
Attention: Nancy Martins  
phc@toronto.ca

**RE: PH35.22 A New Regulatory Framework for Multi-Tenant Houses - Status Review**

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

The City proposed a new Regulatory Framework for Multi-Tenant Houses across Toronto in 2021. The current status report indicates that the regulatory framework will not be completed prior to 2023, given the number and complexity of the directions required by City Council in October, 2021; however some initial planning work has been completed.

We have reviewed the June 16, 2022 Status Report in the context of the earlier reports (June 2021, and October, 2021) and FoNTRA submissions. FoNTRA expressed qualified support both times. Referring back to FoNTRA's concerns detailed in our June 25, 2021 letter and supported by our document "Questions regarding implementation of Multi-Tenant Housing Report", our updated comments on some areas previously identified as issues are follows:.

**Enforcement:**

Enhanced enforcement is essential to ensure that multi-tenant housing is safe and healthy for residents, and the surrounding community. The status update indicates that 2 additional staff have been hired, but we hope that additional officers would be recruited in 2022 and 2023 to deal with the workload.

**Budget:**

We had a number of "Questions" related to the Budget to support enforcement of licensed and unlicensed operations in 2021, 2022, and now 2023. To execute this complex program successfully requires a guaranteed commitment for a major cross-divisional budget increase from 2022 onward. There is no mention of preparation for and funding of such a Budget in 2023 or in subsequent years

**Evaluation:**

FoNTRA previously stated in 2021 that the definition of evaluation criteria and key performance indicators was critical to ensure success of this initiative. Unfortunately we do not see mention of this definition in the status report.

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 creating a comprehensive regulatory and compliance framework for Multi-Tenant Houses.

Yours truly,

Geoff Kettel  
Co-Chair, FoNTRA

Cathie Macdonald  
Co-Chair, FoNTRA

Cc: Mayor John Tory and Members of City Council,  
Giuliana Carbone, Deputy City Manager, Community & Social Services  
Tracey Cook, Deputy City Manager, Infrastructure and Development Services  
Carleton Grant, Director, Municipal Licensing & Standards  
Ginny Adey, Municipal Licensing & Standards  
Gregg Lintern, Chief Planner and Executive Director, City Planning Division  
Kyle Knoeck, Director, Zoning and Committee of Adjustment  
FoSTRA  
CORRA

**The Federation of North Toronto Residents' Associations (FoNTRA)** is a non-profit, volunteer organization comprised of over 30 member organizations. Its members, all residents' associations, include at least 170,000 Toronto residents within their boundaries. The residents' associations that make up FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal.