



December 13, 2022

Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2
Attention: Sylwia Przewdziecki

RE: CC2.1 2023 Housing Action Plan (2021 Multi-Tenant Housing Proposal)

Dear Mayor Tory and Members of City Council,

Mayor Tory, you are recommending that City Council adopt the recommendations in the multi-divisional report from the previous term of council (June 15, 2021) on A New Regulatory Framework for Multi-Tenant Houses, and approve the program implementation costs, and annualized budget as originally outlined in the report.

FoNTRA recognizes that expanding permission for rooming houses across the city is important to ensure affordable housing options. However its careful implementation with enforcement measures is critical to success. As such, we request that you and Members of City Council consider the attached FONTRA submissions of the same time before making decisions. We believe that they provide helpful guidance to your policy deliberations. The detailed list of budget related questions was developed based on discussions with City staff and resident associations from areas where Multi-Tenant Housing has been permitted, as well as those presently unregulated, with on the ground experience.

FoNTRA supports an updated comprehensive regulatory and compliance framework (including zoning bylaw amendments, licensing requirements) for Multi-Tenant Housing across Toronto.

Yours truly,

Geoff Kettel
Co-Chair, FoNTRA

Cathie Macdonald
Co-Chair, FoNTRA

Cc: Paul Johnson, City Manager
Gregg Lintern, Chief Planner and Executive Director, City Planning Division

Attachments:

- (1) FoNTRA letter PH25.10 A New Regulatory Framework for Multi-Tenant Houses, June 2021
- (2) FoNTRA Questions regarding implementation of Multi-Tenant Housing Report, June 2021

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.



Questions regarding implementation of Multi-Tenant Housing Report

- a) Enforcement problems/life-threatening situations are reported with non-compliant and unlicensed Rooming Houses in zoned areas. What will be done between now and Nov 1, 2022 in terms of inspection/enforcement to improve the situation? How will MLS and Toronto Fire make progress with these houses, especially the high risk priority houses, if they did not seek Budget allocations in 2021 to hire additional enforcement officers and fire inspectors, and are not planning to in 2022?
- b) Within the City of Toronto, fraternity houses were deemed to be Rooming Houses and they were given 3 years to become licensed. This has not happened. How is the City going to deal with these houses between now and Nov 1, 2022? Are additional inspection/enforcement officers required?
- c) How will the City deal with illegal Rooming Houses between now and Nov 1, 2022?
- d) It has been stated that MLS does not know the total number of Rooming Houses that exist today across the City, including the areas not yet zoned for Rooming Houses. How can a Plan and a Budget be defined without this information?
- e) How many MTH Houses (licensed and unlicensed in zoned areas (excluding 55 Personal Care Houses) exist today/total tenant population? What number of houses/tenants are projected by end of Year 2? What number of houses/tenants are projected by end of Year 3?
- f) The Report details many activities in Year 1 for 'Laying the Foundation' starting Sep 1, 2021. Are all the costs incurred to date for this work and costs from Sep 1 to Dec 31 to be 'absorbed' by the respective Departments? Are all the costs from Jan 1, 2022 to Oct 31, 2022 to be 'absorbed' as well? How are the Toronto Building consultant, Toronto Fire resources, and additional MLS officers to be paid for?
- g) For this proposal to be successful, major budget support must be guaranteed from Sep 1, 2021 onwards. But additional Budget is not being requested as part of this proposal by any of the involved Departments. Were departments asked to include MTH budget requirements in the 2021 City Budget for Year 1, Year 2 and Year 3? Can the City guarantee that the proposal receives the necessary funding through Department budget requests in future years?
- h) What are the Total Costs across all Departments for Years 1, 2 and 3 including current operating costs? What are the anticipated Revenues?

- i) What is the tenant population in the 55 Personal Care Homes? What # houses/tenants are projected by end of Year 2 and then by end of Year 3? What is the estimate of funding required by the Province to pay for Personal Care Homes? In what year would funding be provided?
- j) What number of MTH houses/tenant population will be opened up by Students moving to affordable housing units provided by the post secondary institution partnerships with the City? What year will this transition occur in?
- k) The City need to evaluate whether Year 2 is successful to determine if the Year 3 program can be initiated. Evaluation Criteria need to be defined. Will evaluation criteria and key performance indicators be defined in Year 1; and tracking performance initiated and reported throughout Year 1 and Year 2?



June 25, 2021

10th floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2
Attention: Nancy Martins

RE: PH25.10 A New Regulatory Framework for Multi-Tenant Houses

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

This is to express our support in principle for the above noted report to create a new comprehensive regulatory and compliance framework (zoning bylaw amendments, licensing requirements), for Multi-Tenant Houses across Toronto.

We appreciate that this represents a cross-divisional multi-pronged initiative that has been a long time in development. We also note that City Planning delivered on our request made in connection with the earlier report (November 2020) to ensure that resident associations (including both tenants, homeowners) are given the opportunity to be engaged in the process of public and stakeholder engagement on the proposed zoning standards for city-wide permissions for multi-tenant housing.

We recognize that expanding permission for rooming houses across the city is important to ensure affordable housing options. Experience in the City of Toronto, that has allowed rooming houses for years, shows the need for such housing, but also for licensing and enforcement to both ensure a safe home for residents, as well as to prevent problems in the neighbourhood. We therefore also support the use of special programs to assist residents as needed.

We also agree with the phasing in of permissions. The report proposes that the first step (Year 2) is to bring existing non-compliant, unlicensed and illegal buildings up to standard, with the delay to November 2022 in the bylaw coming into effect allowing time for the involved Departments to prepare for implementation in Nov. 2022 (Year 2). Then Year 3 will open the opportunity for new applications.

We support the recommendation for enhanced enforcement as this is essential to ensure that multi-tenant housing is safe and healthy for residents, and the surrounding community. This means enforcement of property standards, fire safety as well as community safety. Having a program to help support the needs of residents is an important preventative measure.

The definition of evaluation criteria and key performance indicators is critical to ensure success of this initiative. As such we recommend:

- That PHC request that City Council require that a formal evaluation of Year 2 be undertaken before the introduction of Year 3.

To execute this complex program successfully requires a guaranteed commitment to a major cross-divisional budget increase from 2021 through to Oct 31, 2024. As such we recommend:

- That PHC request that the City Council ensure that the cross-divisional budget adequately covers the costs for the initiative, including zoning by-law enforcement, property standards, and supportive services.

In that regard we will be submitting a detailed list of budget related questions to staff.

Finally, we would comment that given the steep increase in resources that are required (without accompanying revenue offsets) but which are not specifically requested in the current report, it would appear that strong political leadership will be required to ensure adequate resources are made available, and ultimately ensure the success of the program.

Yours truly,

Geoff Kettel
Co-Chair, FoNTRA

Cathie Macdonald
Co-Chair, FoNTRA

Cc: Mayor John Tory and Councillors
Chris Murray, City Manager
Giuliana Carbone, Deputy City Manager Community & Social Services
Tracey Cook, Deputy City Manager, Infrastructure & Development Services
Carleton Grant, Municipal Licensing & Standards
Gregg Lintern, Chief Planner and Executive Director, City Planning Division

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