



Date: June 26, 2015

To: Chair and Members, Toronto Board of Health

Cc: Nancy Martins, Administrator, Toronto Board of Health ([boh@toronto.ca](mailto:boh@toronto.ca))

**Re: HL5.5 Reducing Health Risk from Extreme Heat in Apartment Buildings**

In the summary section of the report it is acknowledged that there are “substantial barriers to achieving this in the short term.” Further in the report the mechanical, structural and technical problems are detailed. This is a complex issue as most of Toronto’s apartment buildings were developed prior to the introduction of air conditioning. These buildings generally do not have duct work. These buildings were designed with windows that are now restricted from opening beyond 10 cm.

Respectfully, Toronto Public Health (TPH) should be recommending an interim strategy of ensuring tenants have access to cooling centres on municipally operated sites, as is the case for all the residents of Toronto. A scan of municipal (and perhaps provincial and federal) properties in close proximity to apartment buildings and apartment clusters should be performed to determine the best locations based on size.

In most buildings, the owner allows for the installation of window air condition units. This has been the normal practice for decades. However, the majority of residents do not and have not opted for this.

The report summarizes the TPH and Tower Renewal “cool room” 2010 pilot project. A majority (59%) of the residents in the pilot building chose over the course of their tenancy to not install air conditioners. Further, most residents without air conditioners did not use this cool room. Many in this pilot preferred shaded outdoor areas, parks or air conditioned public facilities such as a shopping mall.


Again, most residents have chosen to not install air conditioners, and in this pilot most did not utilize the onsite cool room.

Please note that the report incorrectly states, “A landlord can request that a window air conditioner be removed if he or she is not satisfied the unit is installed safely.” In fact, it is Toronto Municipal Licensing and Standards that issues the removal orders to the

building owner. ML&S's order requires that each window unit be accompanied by a letter from an engineer or trained technician certifying that the unit is safely installed. Failure to do so results in an order to remove. ML&S orders the building owner to order the resident to remove uncertified window units.

In closing, this issue highlights the municipality's failure to encourage the construction of purpose-built rental buildings. New buildings would be equipped with modern conveniences such as central air conditioning. Ongoing municipal incentives could renew Toronto's stock of aging apartment buildings, most of which are nearing half a century in age.

Regards,

A handwritten signature in blue ink, appearing to read 'Daryl Chong', with a stylized flourish at the end.

Daryl Chong  
President & CEO  
Greater Toronto Apartment Association