

Wednesday, March 27, 2024

RE: IE12.3 - Toronto's Climate Change Readiness

Dear Members of the Infrastructure and Environment Committee,

Toronto Environmental Alliance applauds the thorough work done by City staff to compile this report and identify necessary next steps the City must take to reach its TransformTO goals and protect residents from escalating impacts of climate change through climate resilience actions. The City is making progress in the climate accountability, reporting, and policy areas.

The report makes it clear that Toronto is not on track to achieve its emissions targets, stating “excepting the pandemic-induced dip in 2020-21, Toronto’s emissions have been tracking above all scenarios.” Transformative systemic changes need to be explored and implemented if the City is to do its fair share to address the climate crisis, and reach its 2030 and 2040 goals. The first step in taking transformative action is to identify the barriers in our path and begin an honest conversation about how to remove them, which this report does well.

City Staff make it very clear in this report that **“to eliminate emissions the use of fossil fuels to heat our buildings and power our transportation must stop.”** We are encouraged by the clarity and frankness of the message, and have some suggestions for areas to accelerate this work:

1. Leading with Reducing City Corporate Emissions

We share the concerns raised by staff in this report that the City will overshoot its internal corporate reduction targets if current emission trends continue, and if large amounts of capital spending continue to be directed to fossil fuel reliant projects.

The City will be advancing many actions to reduce building emissions in the coming years, and must show leadership by shifting away from fossil gas heating in its own facilities. We support the motion to include clear timelines and actions to completely phase out fossil gas from City facilities in the TransformTO 2026-2030 Short-Term Implementation Plan.

We are encouraged to see actions moving forward to reduce emissions from TTC vehicles and the City's own fleets, and encourage Council to support any actions to further accelerate this shift in an effort to show leadership in adopting fossil fuel free technologies.

2. Support for Resilience Plan

TEA strongly supports the staff recommendation to implement a renewed focus and coordinated approach on climate resilience. Our work with communities across the city has highlighted the need for City divisions and agencies to work together to protect residents from the escalating impacts of extreme heat, flooding, wildfire smoke, and more intense storms.

In order to properly protect residents, we need updated data showing where Toronto is most vulnerable. Moving ahead with a vulnerability assessment as suggested by staff is a critical step in doing this. **We would like to highlight the need for this vulnerability assessment to be made public so that residents have access to a full and complete understanding of any threats to public safety, health, infrastructure, and livelihoods, and the need for all City divisions to incorporate these vulnerabilities into their future plans.**

In addition, we strongly encourage the City to include an explicit focus on examining the social infrastructure and community partnerships that are needed to build climate resilience in Toronto. We have learned important lessons from the COVID-19 pandemic, in particular, that residents who are made most vulnerable in emergencies will most likely be supported by their neighbours and community organizations first. The City needs to invest in this frontline response capacity as a core part of climate preparedness.

3. Scaling up transformative change

The staff report makes it clear that the largest and most challenging portion of the City's emissions inventory is the buildings sector and, more specifically, emissions from existing buildings. We strongly support City staff's call to fully implement Emissions Performance Standards (EPS) as a strong action to reduce future emissions from buildings in a stable, predictable way.

However, we cannot rely solely on EPS to cut such a large proportion of the City's emissions. **Toronto needs a transformative, quantum leap in funding for retrofits and decarbonization of existing buildings.** The City should explore funding building decarbonization from sustained, predictable investments from upper levels of government. Toronto should also explore financing

building retrofit grant and loan programs through City revenue sources like the Emissions Performance Standards program, and through the issuing of bonds to long-term investors like pension funds.

The report also notes lack of movement in reducing transportation emissions. “There is more access to safe walking and biking infrastructure than before the pandemic, but Toronto’s Cycling Network Plan remains on a Business as Planned (BAP) pace instead of the ambitious build-out seen in the NZ40 scenario, in part due to resource constraints,” and later noting that reduced transit ridership since the pandemic has slowed progress on transit items. **Toronto cannot reach our TransformTO goals unless we accelerate the pace of cycling, transit, and pedestrian actions, and provide sufficient resources to do so at this increased pace.**

To reach the city’s TransformTO goal of 75% of rush hour traffic outside of private vehicles for trips under 5km, Toronto must follow cities around the world in rebalancing the street space by dedicating more road space to moving more people with surface transit priority corridors, bikeways, and vibrant pedestrian avenues. These more efficient uses of public street space not only move far greater numbers of people than single-occupant motor vehicles, but also improve health, quality of life, and make our streets more beautiful while reducing carbon emissions.

4. Support for Integration of Indigenous Worldviews

TEA strongly supports staff exploring how Indigenous Worldviews have and have not been included into the City’s Climate Action and Climate Resilience plans. We appreciate the importance of connecting this work to the commitments that the City of Toronto has made in the Reconciliation Action Plan and in adopting the United Nations Declaration on the Rights of Indigenous Peoples.

5. Improving Short-Term Goals and Granularity

We applaud the increased granularity of this annual report. Giving Council and the public a better idea of how much the City is progressing in its goals, rather than the previous approach of saying that a goal is ‘in progress’, is a positive step. However, we must also have the bravery to say when the city has failed to achieve a goal. For example, if the City is unable to meet a deadline, this needs to be properly reported, as any consistent failures to meet deadlines may indicate procedural processes that need to be addressed.

While we appreciate the accessibility of the green battery graphics noting progress in each of the short term implementation goals, we suggest pairing each of these areas with an associated review of actual emissions reductions in these areas. The battery graphic currently gives the mistaken impression that the City is on track to meet its actual emission reduction target, which is unfortunately not the case. We are facing a potential situation where the City may implement all of the short-term implementation actions while still experiencing rising emissions. This problem must be faced head-on with an analysis of why these actions are not producing the predicted outcomes. As we are closer to the start of our climate action journey, many of the goals are process-based rather than action-based. We recommend that to more effectively reach 2030 and 2040 goals, the steps in the 2026-2030 five-year plan be more action-based, with clear and measurable deliverables and timelines.

Conclusion

In order to achieve the City's net zero goals, we will need honest annual reporting, even when report results are difficult to hear. We support the approach taken by City staff to transparently report back on successes and obstacles in implementing the TransformTO Net Zero Strategy, and look forward to continued reporting following this same approach. We are hopeful that this will lead to more transformative climate action now and in the future.

Sincerely,



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