Harper Jean Tobin
Director, Community Resilience Project
hjtobin@the519.org

Executive Committee
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

December 9, 2025

RE: EX28.5 - Progress and Priorities for Enhancing Toronto's Climate Resilience

I am pleased to submit these comments on behalf of The 519 Church Street Community Centre. We appreciate the Committee's attention to the urgent and rising climate crisis and the need for accelerating action on lifesaving decarbonization and just and equitable climate resilience.

We thank the staff of the Environment, Climate and Forestry (ECF), Municipal Licensing and Standards (ML&S) Divisions, Toronto Emergency Management (TEM), Toronto Public Health (TPH), and other City partners for their work to develop these reports, recommendations, and to update the Heat Relief Strategy. As a City of Toronto Agency and a member of the Association of Community Centres (AOCCs), and as a centre serving communities disproportionately affected by the climate crisis, we are eager to work with our City partners to advance these goals and plans.

Recognizing these impacts, The 519 is working through its Community Resilience Project to advance climate resilience and action across our programs and operations. In 2025, The 519's Board of Management adopted a strategic commitment to enhance the climate resilience of our building and facilities—consistent with the TransformTO and Resilience Strategies and The 519's goal of serving as a community resilience hub—through resilient retrofits and related projects. As The 519 prepares to celebrate its 50th anniversary throughout 2026, we are reflecting on how our City's climate has already changed dramatically in the past 50 years; keenly aware of the accelerating impacts we face in the next 50 years; and committed to supporting the deep resilience and bold, equitable action our communities need.

We have made separate submissions on Items EX28.3 and EX28.4. We also take note of the closely related reports and recommendations presented at the December 4 Infrastructure and Environment Committee meeting on the Net Zero Action Plan 2026-2030, and submitted separate comments on that report.

Climate adaptation and resilience are essential for all communities in the City, and especially for the Downtown East and 2SLGBTQ+ communities The 519 serves.

Meeting the City's Net Zero and climate resilience commitments is important to The 519 because we serve nearly every community identified in City strategies and existing research as facing heightened climate-health risk exposure and vulnerability, including: 2SLBTQ+ people; Newcomers; unhoused and insecurely-housed people, older adults; families with young children; people with mental illness; drug users; sex workers; and Black, Indigenous, and racialized communities.

The 519's catchment area, historically centered around the Church-Wellesley neighbourhood, expanded in 2024 to take in much of the Downtown East. As University of Toronto researchers have shown, our catchment area is among those areas of the city with the highest vulnerability to

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extreme heat.[1] The new Climate Risk and Vulnerability Assessment (CCRVA) provides additional illustrations of the Downtown East's elevated heat vulnerability.[2] Many of the neighbours we work with every day live in buildings that can rapidly become unsafe during extreme weather, poor air quality, and/or outages. Others are unhoused or insecurely housed and have little ability to protect themselves from outdoor conditions.

The 519 also serves 2SLGBTQ+ people across the city, a population that is more exposed to, and more at risk from, unsafe indoor temperatures and other climate risks. The 519 summarized the growing evidence of these disparities in our 2024 report *Framing Queer Resilience and Climate Justice*, and we discuss them further below.[3]

For these and other reasons, the City cannot fulfill its commitments to equity for 2LGBTQI+ communities, as well as other equity-deserving groups, without bold and urgent climate action.

The City's Climate Change Adaptation Action Plan is urgently needed and deserves more urgent follow-up.

We support the actions recommended in recommendations 3 through 7, but suggest that they deserve more urgent timelines. As outlined in ECF's report, the City began developing its first *Resilience Strategy* over a decade ago, and Council directed the Council directed a "refreshed" resilience mandate, priorities, and recommended steps nearly 20 months ago. We recognize the significant work involved in the cross-division and -agency effort to develop a comprehensive Climate Change Adaptation Action Plan, and the initial steps identified in the Climate Change Resilience Workplan, Nevertheless, given the risks, vulnerabilities, and the fiscal and human costs identified in the CCRVA and in Attachment 3 ("Anticipated Climate-Related Costs to the City of Toronto and the Public"), we encourage Council to consider the costs to the city and its residents that may be involved in taking another 18 months to develop a comprehensive action plan.

We suggest that ECF, with the support of Council, **seek to accelerate this timeline to Q4 of 2026 or Q1 of 2027**. We likewise suggest that the Finance and Treasury and Parks and Recreation Divisions work with ECF, the support of Council, to **report at the time on their workplan for integrating climate considerations into the assessment management process**, ahead of the 2030 plan update.

The City's Action Plan should include engagement with and consideration of 2SLGBTQ+ people are vulnerable populations at greater risk from climate change.

We appreciate the emphasis in ECF's report and Workplan, and in the CCRVA reports, on prioritizing actions to engage, support, and protect vulnerable and equity-deserving populations that are disproportionately affected by climate risks; and on partnership with Indigenous leaders and communities, including Two-Spirit people.

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[1] Bu S. et al., *Mapping Heat Vulnerability in Toronto*, Univ. of Toronto School of Cities (Aug. 6, 2024), https://schoolofcities.github.io/heat-vulnerability-toronto/.
[2] Sustainability Solutions Group, *Toronto's Climate Risks: Understanding Vulnerability Today, Preparing for Tomorrow: Summary Report*, Figures 7, 10-11 (Nov. 2025), https://www.toronto.ca/legdocs/mmis/2025/ex/bgrd/backgroundfile-260483.pdf.
[3] The 519, *Framing Queer Resilience and Climate Justice: Exploring Approaches to 2SLGBTQ+ Resilience to Climate Change and Other Shocks and Stresses* (2024), https://www.the519.org/climate-justice/. *See also* Mann S., McKay T., Gonzales G., Climate Change-Related Disasters & the Health of LGBTQ+ Populations, *J. Clim. Chang. Health*, 18:100304 (2024), https://doi.org/10.1016/j.joclim.2024.100304.

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We note that differing descriptions of and references to "vulnerable," "at risk," and "equity-deserving" groups across these documents may not provide optimal clarity and focus for staff across City government in developing their engagement and action plans. For example, we appreciate that 2SLGBTQ+ people are mentioned in the CCRVA technical report,[4] but note that this population—along with women and gender equity considerations—are not mentioned in the other reports when describing vulnerable groups. (We recognize some general references to vulnerable and equity-deserving groups are meant to be broad.)

As The 519 described in our 2024 report *Framing Queer Resilience and Climate Justice*, growing body of evidence shows 2SLGBTQ+ people both more exposed to, and more at risk from, climate risks.[5] As with BIPOC populations, 2SLGBTQ+ people's climate vulnerabilities are based in part on their disproportionate membership in other vulnerable groups (*e.g.*, people who are unhoused, low-income, disabled, or working in more risk-exposed jobs), and in part on direct effects of anti-2SLGBTQ+ discrimination and stigma.

2SLGBTQ+ are *more exposed to* climate risks because of factors such as poverty and where they live and work. According to Statistics Canada, 2SLGBTQ+ people nationally and in Ontario are more likely to be in the lowest income quintile, despite having higher levels of education.[6] 2SLGBTQ+ Canadians are also more likely to live in rental housing,[7] and less likely to express satisfaction with their access to resources such as access to green space and clean air and water.[8] As the City's data has already shown, an unconscionable number of low-income renters in Toronto live in outdated apartment buildings without heat pumps or air conditioning.

Additionally, 2SLGBTQ+ people are also *more at risk from* unsafe indoor temperatures and other climate hazards. This because 2SLGBTQ+ populations experience multiple disparities in health and social determinants of health, "driven by social forces, such as stigma, prejudice, and discrimination," that can increase their risk exposure during extreme heat and other climate hazards.[9] These factors include:

- Health conditions. 2SLGBTQ+ Canadians face well-documented health disparities, including in self-rated overall health and a variety of mental health and chronic physical health conditions.[10] Some 2SLGBTQ+ populations have higher levels of smoking, asthma,

[4] Sustainability Solutions Group, *City of Toronto Climate Change Risk and Vulnerability Assessment (CCRVA): Technical Report*, pp. 73, 276 (Nov. 2025), https://www.toronto.ca/wp-content/uploads/2025/11/906b-Technical-ReportTorontos-Climate-Risks-Understanding-Vulnerability-Today-Preparing-for-Tomorrow-.pdf. We note that the layout of the tables in Appendix C may be confusing to some, as it may not be immediately clear that the bulleted lists of examples do not correspond to the vulnerability score rankings opposite them.
[5] The 519, *Framing Queer Resilience and Climate Justice: Exploring Approaches to 2SLGBTQ+ Resilience to Climate Change and Other Shocks and Stresses* (2024), https://www.the519.org/climate-justice/. *See also* Mann S., McKay T., Gonzales G., Climate Change-Related Disasters & the Health of LGBTQ+ Populations, *J. Clim. Chang. Health*, 18:100304 (2024), https://doi.org/10.1016/j.joclim.2024.100304.
[6] Statistics Canada, Table 13-10-0874-01: Socioeconomic characteristics of the 2SLGBTQ+ population, 2019 to 2021 (2024), https://doi.org/10.25318/1310087401-eng.
[7] Statistics Canada, Housing experiences in Canada: LGBTQ2+ people in 2018 (2021), https://www150.statcan.gc.ca/n1/pub/46-28-0001/2021001/article/00004-eng.htm.
[8] Statistics Canada, Table 45-10-0070-01: Satisfaction with local environment, by gender and other selected sociodemographic characteristics (2025), https://doi.org/10.25318/4510007001-eng.
[9] Nat'l Acad. Sci., Engineer., & Med., *Understanding the Well-Being of LGBTQI+ Populations* (2020), https://doi.org/10.17226/25877. *See also* Kinitz D.J. et al., Health of 2SLGBT people experiencing poverty in Canada: a review, *Health Promotion Int'l* 37:daab057 (2022), https://doi.org/10.1093/heapro/daab057 ("Discrimination was an overarching finding that explained persistent associations between 2SLGBTQ+ status, poverty and health").
[10] *See, e.g.*, Comeau D., Johnson C, & Bouhamdani N., Review of current 2SLGBTQIA+ inequities in the Canadian health care system, *Front. Public Health* 11:1183284 (2023), https://doi.org/10.3389/fpubh.2023.1183284.

and risks of cardiovascular disease.[11] Pre-existing respiratory conditions put individuals at greater risk from heat waves, wildfires, and smoke exposures. There is also evidence of higher rates of some other chronic conditions, such epilepsy,[12] which can also be exacerbated by heat events.[13]

- Physical disabilities. 2SLGBTQ+ people are more likely to have mobility impairments and other physical disabilities.[14] Structural and other ableist barriers routinely endanger people with these impairments by making it more difficult to move to a cooler place or seek help during a heat wave or other climate event, including when power or utilities fail.
- Medications. 2SLGBTQ+ people may be more likely to rely on any of a range of medications that could increase risks of heat illness, including certain antidepressants and other mental health medications, or diuretics like the antiandrogen spironolactone.[15]
- Isolation and living alone. Studies have found that some 2SLGBTQ+ populations, including older 2SLGBTQ+ adults, are more likely to live alone and experience social isolation and loneliness, creating additional risks during extreme heat and other climate events.[16]
- Discrimination and barriers to help. 2SLGBTQ+ also experience barriers to seeking and receiving effect help in extreme weather and other emergencies, due to legacies and continuing realities of stigma and discrimination.[17]
- Risk of displacement. During climate disasters other than extreme heat—particularly, as relevant to Toronto, extreme precipitation and storms— emerging evidence indicates 2SLGBTQ+ people are more likely to be displaced from their homes, and to face worse conditions when displaced.[18]

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[11] *See*, *e.g.*, Ferriter K.P., Parent M.C., & Britton M., Sexual orientation health disparities in chronic respiratory disorders, *Chronic Obstr Pulm Dis.* 11:307 (2024), http://doi.org/10.15326/jcopdf.2023.0467; Tran N.K., et al. Prevalence of 12 Common Health Conditions in Sexual and Gender Minority Participants in the All of Us Research Program, *JAMA Netw. Open* 6:e2324969 (2023), https://doi.org/10.1001/jamanetworkopen.2023.24969; Abramovich A. et al., Assessment of Health Conditions and Health Service Use Among Transgender Patients in Canada, *JAMA Netw. Open* 3:e2015036 (2020), https://doi.org/10.1001/jamanetworkopen.2020.15036; Caceres B.A. et al., Assessing and addressing cardiovascular health in LGBTQ adults: a scientific statement from the American Heart Association, *Circulation* 142:e321 (2020), https://doi.org/10.1161/CIR.0000000000000914.

[12] *See*, *e.g.*, Johnson E.L., et al. Prevalence of Epilepsy in People of Sexual and Gender Minoritized Groups, *JAMA Neurol.* 81(9):996 (2024), https://doi.org/10.1001/jamaneurol.2024.2243; Pinnamaneni, M. et al., Disparities in chronic physical health conditions in sexual and gender minority people using the US Behavioral Risk Factor Surveillance System, *Prev. Med. Rep.* 28:101881 (2022), https://doi.org/10.1016/j.pmedr.2022.101881.

[13] See, *e.g.*, Gulcebi M.I. et al., Climate change and epilepsy: Insights from clinical and basic science studies, *Epilepsy & Behav.* 116:107791 (2021), https://doi.org/10.1016/j.yebeh.2021.107791.

[14] *See*, *e.g.*, Rauh K, Functional health difficulties among LGB people in Canada, Statistics Canada cat. no. 45200002 (2023), https://www150.statcan.gc.ca/n1/pub/45-20-0002/452000022023003-eng.htm; Smith-Johnson M., Transgender Adults Have Higher Rates Of Disability Than Their Cisgender Counterparts, *Health Affairs* 41:1470 (2022), https://doi.org/10.1377/hlthaff.2022.00500; Pharr J.R. & Batra K. Physical and Mental Disabilities among the Gender-Diverse Population Using the Behavioral Risk Factor Surveillance System, BRFSS (2017—2019): A Propensity-Matched Analysis, *Healthcare* 9:1285 (2021), https://doi.org/10.3390/healthcare9101285.

[15] *See* Winklmayr C. et al., Heat in Germany: Health risks and preventive measures, *J. Health Monit.* 8(Suppl 4):3 (2023), https://doi.org/10.25646%2F11651.

[16] Statistics Canada, Family and household characteristics of 2SLGBTQ+ people in Canada (2024), https://www150.statcan.gc.ca/n1/pub/11-627-m/11-627-m2024046-eng.htm. *See also* Grady A. & Stinchcombe A., The impact of COVID-19 on the mental health of older sexual minority Canadians in the CLSA, *BMC Geriatr.* 23:816 (2023), https://doi.org/10.1186/s12877-023-04513-w; Kim H.-J. & Fredriksen-Goldsen K.I., Living arrangement and loneliness among LGB older adults, *Gerontologist* 56:548 (2016), https://doi.org/10.1093/geront/gnu083; Fredriksen-Goldsen K.I., et al., Health disparities among LGB older adults: results from a population-based study, *Am. J. Pub. H.* 103:1802 (2013), https://doi.org/10.2105/AJPH.2012.301110.

[17] Kilpatrick C. et al., A Rapid Review of the Impacts of Climate Change on the Queer Community, Environmental Justice, 17(5):306 (2024), https://doi.org/10.1089/env.2023.001; Goldsmith, L., Raditz, V. & Méndez, M., Queer and present danger: understanding the disparate impacts of disasters on LGBTQ+ communities *Disasters*, 46:946 (2022), https://doi.org/10.1111/disa.12509.

[18] Geiger J., Méndez M., & Goldsmith L., Amplified harm: LGBTQ+ disaster displacement" (UCI School Soc. Ecol., 2023), https://socialecology.uci.edu/news/amplified-harm-lgbtq-disaster-displacement.

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We encourage ECF and all our City partners, with the support of Council, to **ensure that this emphasis includes engagement with and consideration of 2SLGBTQ+ people as vulnerable populations, and of gender equity generally, in their equity analyses and frameworks, action plans, and key performance indicators**.

The City's Key Performance Indicators should be robust, transparent, and include a multi-dimensional focus on equity.

We support the proposed "comprehensive and adaptive monitoring, evaluation, reporting and learning approach that uses key performance indicators and targets to improve decision making,"[19] including sections of 2.5.1 and 4.3.2 of the Climate Change Resilience Workplan. We suggest that ECF and other City partners, with the support of Council, **prioritize developing Key Performance Indicators (KPIs) that include multiple dimensions of equity and justice**. This should include metrics that enable tracking of equity impacts and goals with regard to key resources and risk and protective factors and multiple vulnerable groups. For example, this might include:

- *Access to protective factors and exposure to risk factors*, such as: Access to shelter and adequate indoor temperatures; access to natural resources and shade; and access to and reach of community programs and opportunities.
- *Climate-health impacts*, such as morbidity and mortality linked to key climate hazards.
- *Education campaigns and community programs* (*e.g.*, their reach and accessibility).

The City should engage and support the Association of Community Centres (AOCCs) members on the development and implementation of Action Plan.

We appreciate the cross-government approach suggested in the Climate Change Resilience Workplan, including its express references to engaging City Agencies in sections 1.1.1 (coordination with Agencies by the Oversight Table), 1.1.2 (participation of Agencies in interdivisional working tables), 1.2.1 (supporting Action Plan development), 2.1.4 (incorporating climate resilience in corporate infrastructure projects), 2.3.2 (improving flooding data), and 3.2.1 (reviewing home energy programs), and ECF's commitment to looking for opportunities for alignment.

We encourage ECF and all City Divisions, with the support of Council, to, across these and other areas of effort, **consult and engage AOCC members, and offer technical and other resources and supports to enable them to support implementation across their own and Divisional programs**. AOCCs may be able to make valuable contributions to other areas of the Workplan, for example in improving cost information (section 2.4), establishing and tracking equity-focused performance indicators (2.5), and engaging and supporting communities (3.1-3.3, 4.1.3). Additionally, while recognizing differences in how City Agencies and Divisions operate, we suggest AOCCs might benefit from access to the same or similar technical supports and resources as ECF provides to Divisions (*e.g.*, 2.1.5, 2.1.8, 2.2.1, 4.1).

[19] Item EX28.5, Report of the Executive Director, Environment, Climate and Forestry, p. 22.

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The City should commit to and rapidly. implement key actions identified in the *Climate Change Risk and Vulnerability Assessment*.

We appreciate the inclusion of Potential Actions in the CCRVA summary report and of the Potential Actions Table ranked by suggested priority in the CCRVA technical report. We particularly support the following actions, and we suggest the ECF and other City partners, with the support of Council, prioritize implementing these steps:

- Adopt "a maximum temperature bylaw for rental units that would limit indoor temperatures to 26 °C during hot weather."[20]
- "[F]urther invest in and embed climate risk into shelter operations and surge planning by defining triggers, overflow sites and staffing needs."[21]
- Implement "consistent/ minimum standards for primary care and mental health services in shelters for people experiencing homelessness."[22]
- Establish an "Integrated Network of Climate Resilience Hubs."[23]
- "Strengthen and Expand the Heat Relief Network," including investing in " Extended hours, reliable cooling equipment and clear wayfinding."[24]
- "[T]reat green infrastructure and stream corridors as essential city infrastructure."[25]
- "Create a rapid community-relief fund," "automatically released when heat or flood alerts are issued, to provide immediate assistance with welfare checks, food replacement, cooling and temporary shelter."[26]
- "Develop strategic cooling plans for priority neighbourhoods."[27]
- "Expand air conditioner distribution program focused on additional heat-vulnerable populations" and "Expand or replace the heat-pump initiative to reach wider population."[28]
- "Upgrade HVAC systems in schools, daycares and other facilities."[29]
- "Create and expand integration of food hubs," "Support local food producers growing food in Toronto," and "Expand partnerships … to recover near-expiring food and redistribute it."[30]
- "Develop and update public realm design standards to reduce urban heat and support climate resilience" and "Develop a public realm design for heat."[31]

We suggest that City partners, with the support of Council, **commit to and work to rapidly implement the above-noted key actions.** We note that a maximum indoor temperature standard was appropriately rated as a "Very High" priority in the CCRVA. We suggest that some additional items, especially regarding shelter capacity and access, should also be regarded as "Very High" priorities relative to preventing some of the City's greatest near-term morbidity and mortality risks.

[20] Sustainability Solutions Group, *Toronto's Climate Risks*, p. 30.
[21] *Ibid*. at 46.
[22] *Ibid*. at 63.
[23] *Ibid*. at 35.
[24] *Ibid*. at 49.
[25] *Ibid*. at 54.
[26] *Ibid*. at 60; Sustainability Solutions Group, *City of Toronto CCRVA Technical Report*, p. 251.
[27] Sustainability Solutions Group, *Toronto's Climate* Risks, p. 66.
[28] *Ibid*. at 66, 69.
[29] *Ibid*. at 69.
[30] *Ibid*. at 63-34.
[31] *Ibid*. at 67-68.

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The City needs meaningful more estimates of the financial and human costs of inaction.

We appreciate the report's high-level discussion of the key "Risk Themes" of compounding health and affordability crises; degradation of infrastructure, public services, and natural resources; and interconnected and cascading risks, and the inclusion of Attachment 3, "Anticipated Climate-Related Costs to the City of Toronto and the Public."[32] We likewise appreciate the inclusion of steps to improve cost information in section 2.4 of the Climate Change Resilience Workplan.

We note that in its March 2024 report to the Infrastructure & Environment Committee, ECF stated it was working with the Ontario Resource Centre for Climate Adaptation "to estimate the cost of inaction," in order to "clarify the financial risks facing Toronto from climate change and provide context to the costs of adaptation."[33] While Attachment 3 provides a high-level summary of broad categories of costs, it includes no estimates of those costs, nor any sense of scale or proportion. Nor is such an accounting provided in the new CCRVA. While the CCRVA provides a great deal of importance data, analysis, and visualizations for characterizing the City's risks and vulnerabilities, it also lacks clear characterizations or discussions of key risks that ECF should address in future reports. In particular, the CCRVA lacks clarity regarding the scale and scope of mortality risks for the City resulting from particular climate hazards (including mortality risks related to extreme temperatures, particulate matter, suicidality, overdose, interpersonal violence, or disease).

We suggest that ECF, consistent with section 2.4 of the Workplan and with the support of the Finance & Treasury Divisions and of Council, provide a **much more detailed characterization of the scale and scope of the costs of inaction for the City of Toronto, including actual estimates or projections wherever possible**, in its next reports on this topic.

Conclusion.

We reiterate our appreciation of the efforts of ML&S, ECF, TPH, TEM, this Committee, and our other City partners to advance plans for the next phases of action to meet the City's commitments to climate resilience and to protect residents from life-threatening heat. We look forward to working with you, together with other AOCCs and community partners, to advance the transformational actions needed to preserve the lives, health, resilience of Toronto's residents in the critical years ahead.

Thank you for your consideration.

Sincerely,

Harper Jean Tobin
Director, Community Resilience Project

[32] "ATTACHMENT 3: Anticipated Climate-Related Costs to the City of Toronto and the Public," https://www.toronto.ca/legdocs/mmis/2025/ex/bgrd/backgroundfile-260485.pdf.
[33] Report of the Executive Director, Environment & Climate Division, "Toronto's Climate Change Readiness: Updates on commitments and a refreshed mandate for coordinating resilience activities," pp. 3, 14 (Mar. 13, 2024), https://www.toronto.ca/legdocs/mmis/2024/ie/bgrd/backgroundfile-244181.pdf.