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Infrastructure & Environment Committee
City Hall
100 Queen St. W
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RE: IE22.9 - TransformTO Net Zero Strategy - 2024 Annual Report on Implementation Progress

I am pleased to submit these comments on behalf of The 519 Church Street Community Centre. We appreciate the Committee's continued oversight and attention to the implementation of the City's Net Zero Strategy. We wish to share why stronger action to implement this strategy – including, but not limited to, the adoption of a resilient retrofits by-law with strong tenant protections – is urgent and essential for the neighbourhoods and the people The 519 serves.

In particular, we wish to underscore three points highlighted in the Environment, Climate and Forestry Division's (ECF) reports to Council over the past year:

1. The City is still not on track to meet its Net Zero targets, and its next Action Plan will require bigger, bolder actions and investments to do so.
2. The City's Net Zero targets depend in large part on the extent to which it can achieve climate-resilient building retrofits, quickly and on a very large scale. Thus, the planned Building Emissions Performance Standards (BEPS) is central to its climate goals.
3. In order to succeed, the forthcoming BEPS by-law and accompanying programs must pair transformational standards and investments with strong tenant protections.

As a City of Toronto Agency, and as Canada's largest 2SLGBTQI+ organization, The 519 Community Centre strives to make a real difference in people's lives, while working to promote community well-being, equity and justice for 2SLGBTQI+ communities. Recognizing the growing impact of disruptive events such as the COVID-19 pandemic and extreme weather on marginalized communities in Toronto and elsewhere, we are seeking to integrate a community resilience lens throughout our work. In 2024, The 519 published a report, *Framing Queer Resilience and Climate Justice: Exploring Approaches to 2SLGBTQI+ Resilience to Climate Change and Other Shocks and Stresses*, arguing for climate justice and resilience as critical priorities for 2SLGBTQI+ communities.¹ As The 519 approaches its 50th anniversary in 2026, we recognize our responsibility to help secure thriving, resilient futures for our communities through the next 50 years of a changing climate.

Background: Red alert for our urban heat islands

The City's rapidly changing climate and its responses to the climate catastrophe have disproportionate impacts on both of the constituencies The 519 is charged with serving: The residents of its Downtown East catchment area, and 2SLGBTQI+ communities across the City. One especially concerning area of impact concerns extreme heat.

¹ The 519, *Framing Queer Resilience and Climate Justice: Exploring Approaches to 2SLGBTQI+ Resilience to Climate Change and Other Shocks and Stresses* (2024), <https://www.the519.org/climate-justice/>.

The 519's catchment area, historically centered around the Church-Wellesley neighbourhood, has recently expanded to take in much of the Downtown East. Many of the neighbours we work with every day live in buildings that can rapidly become unsafe during heat events. As University of Toronto researchers have shown, our catchment area is among those with the highest vulnerability to extreme heat in Toronto.² Their Heat Vulnerability Maps reflect the greater heat exposure of our neighbourhoods, greater heat sensitivity of our spaces and our neighbours, and the lack of neighbourhood resources that track the familiar "u-shaped" arc of inequality across our city. It adds up to the bright red shading all over our expanded catchment - a red alert for our communities and for much of the city.

Background: Heat-health risks for 2SLGBTQI+ people

The 519 also serves 2SLGBTQI+ people across the city, a population that is more exposed to, and more at risk from, unsafe indoor temperatures. They are *more exposed to* unsafe indoor temperatures because they are more likely to be low-income renters. 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.³ 2SLGBTQI+ Canadians are also more likely to live in rental housing.⁴ As the City's data has already shown, an unacceptable number of low-income renters in Toronto live in outdated apartment buildings without heat pumps or air conditioning.

2SLGBTQI+ people are *more at risk from* unsafe indoor temperatures because they 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 heat events.⁵ These factors include:

- **Health conditions.** 2SLGBTQI+ Canadians are more likely to rate their overall health as fair or poor.⁶ Some 2SLGBTQI+ populations have higher levels of smoking, asthma, and risks of cardiovascular disease.⁷ 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 as epilepsy,⁸ which can also be exacerbated by heat events.⁹
- **Mobility impairments.** 2SLGBTQI+ people are more likely to have mobility impairments and other physical disabilities.¹⁰ Structural and other ableist barriers routinely endanger

² Bu S. et al., [Mapping Heat Vulnerability in Toronto](#), Univ. of Toronto School of Cities (Aug. 6, 2024).

³ Statistics Canada, [Table 13-10-0874-01: Socioeconomic characteristics of the 2SLGBTQ+ population, 2019 to 2021](#) (2024).

⁴ Statistics Canada, [Housing experiences in Canada: LGBTQ2+ people in 2018](#) (2021).

⁵ Nat'l Acad. Sci., Engineer., & Med., [Understanding the Well-Being of LGBTQI+ Populations](#) (2020). See also Kinitz D.J. et al., [Health of 2SLGBT people experiencing poverty in Canada: a review](#), *Health Promotion Int'l* 37:daab057 (2022) ("Discrimination was an overarching finding that explained persistent associations between 2SLGBTQ+ status, poverty and health").

⁶ Nat'l Acad. Sci., Engineer., & Med., [Understanding the Well-Being of LGBTQI+ Populations](#) (2020).

⁷ 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); 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); Abramovich A. et al., [Assessment of Health Conditions and Health Service Use Among Transgender Patients in Canada](#), *JAMA Netw. Open* 3:e2015036 (2020); 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).

⁸ See, e.g., Johnson E.L., et al. [Prevalence of Epilepsy in People of Sexual and Gender Minoritized Groups](#), *JAMA Neurol.* online (2024); 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).

⁹ See, e.g., Gulcebi M.I. et al., [Climate change and epilepsy: Insights from clinical and basic science studies](#), *Epilepsy & Behav.* 116:107791 (2021).

¹⁰ See, e.g., Smith-Johnson M., [Transgender Adults Have Higher Rates Of Disability Than Their Cisgender Counterparts](#), *Health Affairs* 41:1470 (2022); 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).

people with these impairments by making it more difficult to move to a cooler place or seek help during a heat event, including when power or utilities fail.

- Medications. 2SLGBTQI+ 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.¹¹
- Isolation and living alone. Studies have found that some 2SLGBTQI+ populations, including older 2SLGBTQI+ adults, are more likely to live alone and experience social isolation and loneliness, creating additional risks during heat events.¹²

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.

Bigger, bolder action and investment are needed, with a focus on justice

With this background, we appreciate the candor of ECF's May 28 report in stating clearly that, "With the current pace of emissions reductions, the City is unlikely to meet its 2025 emissions target."¹³ Moreover, as ECF recognized in its 2024 implementation report, the City's Short-Term Implementation Actions "alone will not achieve our climate goals," and many have yet to be completed.¹⁴ The City's Action Plan for 2026-2030 must make bigger, bolder commitments—and Council must adopt legislation and budgets that fulfill them.

The City has rightly recognized the critical importance of resilient retrofits. In 2023, it estimated that 476,000 homes and buildings required retrofits by 2040.¹⁵ Yet last year ECF estimated that: "To be on pace for net zero by 2040 the pace of residential (and commercial) retrofits needs to increase multiple times from current levels."¹⁶ The Atmospheric Fund estimates that "the pace of retrofitting buildings in the GTHA needs to quintuple."¹⁷ ECF reports that the City's retrofit programs issued loans for under 300 homes and just three high-rise buildings in 2024.¹⁸ The Deep Retrofit Challenge has six active projects, with most to be finished this year.¹⁹ The City did not report 2024 retrofit numbers for City-owned buildings, but the 2024 Budget called for starting work on five.²⁰

These are all valuable and needed efforts, and they reflect the hard, thoughtful, and creative work of staff across several City divisions. But the limited resources devoted to them to date stand in stark contrast to the City's ambitious targets. The 2025 Budget and 2025-2034 Capital

¹¹ See Winklmayr C. et al., [Heat in Germany: Health risks and preventive measures](#), *J. Health Monit.* 8(Suppl 4):3 (2023).

¹² Statistics Canada, [Family and household characteristics of 2SLGBTQ+ people in Canada](#) (2024). 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); Kim H.-J. & Fredriksen-Goldsen K.I., [Living arrangement and loneliness among lesbian, gay, and bisexual older adults](#), *Gerontologist* 56:548 (2016); Fredriksen-Goldsen K.I., et al., [Health disparities among lesbian, gay, and bisexual older adults: results from a population-based study](#), *Am. J. Pub. H.* 103:1802 (2013).

¹³ Environment, Climate and Forestry Division (hereinafter ECF), TransformTO Net Zero Strategy: 2024 Annual Report on Implementation Progress (May 28, 2025), <https://www.toronto.ca/legdocs/mmis/2025/ie/bgrd/backgroundfile-255754.pdf>.

¹⁴ City of Toronto, Annual TransformTO Net Zero Progress and Accountability Report (June 2024), [toronto.ca/wp-content/uploads/2024/03/95d3-Attachment-1-Annual-TransformTO-Net-Zero-Progress-and-Accountability-Report.pdf](https://www.toronto.ca/wp-content/uploads/2024/03/95d3-Attachment-1-Annual-TransformTO-Net-Zero-Progress-and-Accountability-Report.pdf).

¹⁵ ECF, Update on the Net Zero Buildings Strategy and Implementation of Mandatory Emissions Performance Standards (Sept. 6, 2023), <https://www.toronto.ca/legdocs/mmis/2023/ie/bgrd/backgroundfile-239097.pdf>.

¹⁶ ECF, Toronto's Climate Change Readiness: Updates on commitments and a refreshed mandate for coordinating resilience activities, Appx. 1.3: GHG Reduction Actions in 2024 Budget (Mar. 13, 2024), <https://www.toronto.ca/legdocs/mmis/2024/ie/bgrd/backgroundfile-244193.pdf>.

¹⁷ The Atmospheric Fund, *Annual Plan 2025* (Jan. 2025), <https://www.toronto.ca/legdocs/mmis/2025/ta/bgrd/backgroundfile-252928.pdf>.

¹⁸ ECF, Summary of implementation progress to the end of 2024 on actions from the Short-term Implementation Plan 2022-2025 of the TransformTO Net Zero Strategy, <https://www.toronto.ca/legdocs/mmis/2025/ie/bgrd/backgroundfile-255755.pdf>.

¹⁹ ECF, Deep Retrofit Challenge (accessed June 9, 2025), <https://www.toronto.ca/services-payments/water-environment/net-zero-homes-buildings/better-buildings-partnership/deep-retrofit-challenge/>.

²⁰ Financial Planning Division, 2024 Program Summary Corporate Real Estate Management (2024), <https://www.toronto.ca/wp-content/uploads/2024/04/9014-2024-Public-Book-CREM-V1.pdf>.

Plan increase these investments, but still not at levels required to meet Net Zero targets. For example, while most of the City's 2,500+ buildings require Net Zero retrofits, the current Budget and Capital Plan appear to include retrofits for only around 150 of these, plus around 500 more studies.²¹ Moreover, if the City is not able to fully defend and implement the Toronto Green Standards for new buildings in the wake of Bill 17, retrofitting existing buildings will become even more urgent.

We therefore appreciate ECF's recognition that transformative action on resilient retrofits must be at the center of the City's climate strategy going forward, stating: "The pathway chosen through BEPS will have the most material effect on the pace at which Toronto can move toward its climate goals."²² That's because 56% of Toronto's emissions come from its buildings—and because the resilience of its buildings is absolutely essential to the safety and health of its residents.

Moreover, we applaud ECF's prior commitments that "The BEPS will be developed with a lens on equity to address cost impacts for low-income communities and tenants, and other sectors that may face challenges related to affordability," and "in a manner that maximizes equitable outcomes on health, comfort, protection of affordable housing and energy affordability."²³

BEPS must pair transformational standards and investments with strong tenant protections.

Therefore, in order for it and City's Net Zero Strategy to succeed, BEPS must be bold enough to secure transformational change, while protecting residents—especially low-income renters—and holding them harmless.

This will be difficult, but it must be done, and urgently. The climate crisis cannot be allowed to become an excuse for displacement—nor can the housing crisis be allowed to become an excuse for climate inaction. Without bold action and strong protections, these twin crises will merely exacerbate each other year by year.

Toronto can lead on climate and housing justice, but we need bold action that leaves no one behind. The 519 has been pleased to participate in the BEPS Equity Advisory Committee. We look forward to hearing more about the planned approach for BEPS, and to continued engagement on this and other pillars of the City's climate mitigation and resilience strategies.

Thank you for your consideration.

Sincerely,



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²¹ ECF, 2025 CAPITAL/OPERATING BUDGET BRIEFING NOTE Carbon Budget, Appx. B: Carbon Budget Prioritization (Jan. 13, 2025), <https://www.toronto.ca/legdocs/mmis/2025/bu/bgrd/backgroundfile-252127.pdf>. Like most City Agencies in the Association of Community Centres (AOCCs), The 519 operates in a City-owned building. AOCCs have received no information so far on when to expect retrofit studies or implementation. The 519 recently commissioned an initial climate resilience audit of our building and facilities, which pointed to major investments needed in the coming years. We look forward to working with CREM and ECF to help fund and implement these retrofits for our buildings as well as for the other AOCCs.

²² ECF, TransformTO Net Zero Strategy: 2024 Annual Report on Implementation Progress.

²³ ECF, Building Emissions Performance Standards (BEPS): Design Principles and Development Plan (June 24, 2024), <https://www.toronto.ca/legdocs/mmis/2024/ie/bgrd/backgroundfile-246952.pdf>.