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Infrastructure and Environment Committee
Toronto City Hall
100 Queen Street West
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December 4, 2025

RE: IE26.3 - TransformTO Net Zero Strategy: Action Plan (2026-2030)

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 climate resilience.

We thank the staff of the Environment, Climate and Forestry (ECF) and Finance and Treasury (F&T) Divisions and other City partners for their work to develop the Net Zero Strategy Action Plan (2026-2030) and the Advanced Plans for Corporate net zero actions. 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.

We take note of the closely related reports and recommendations to be presented at the December 9 Executive Committee meeting—on developing a Climate Resilience Action Plan, updating the City's Heat Relief Strategy, and the urgent need for a Maximum Indoor Temperature by-law—and will be submitting comments to the Executive Committee on those reports.

Net zero efforts are essential for all communities in the City, and especially for the Downtown East and 2SLGBTQI+ 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: 2SLGBTQI+ 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 extreme heat.¹ The City's newly-published *Climate Change Risk and Vulnerability Assessment* provides additional illustrations of the Downtown East's climate 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.

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>.



The 519's mission also includes serving 2SLGBTQI+ communities across the City, who are also more exposed to, and more at risk from, climate-health impacts, due to health, housing, economic, and social disparities and barriers driving by stigma and discrimination. The 519 summarized evidence of these disparities and strategies for action in our 2024 report *Framing Queer Resilience and Climate Justice*.³ For example, 2SLGBTQ+ residents are *more exposed to* unsafe indoor temperatures because they are more likely to be low-income renters, and at *more at risk from* them because they experience multiple disparities in health and social determinants of health, “driven by social forces, such as stigma, prejudice, and discrimination,” that contribute to climate-health outcomes.⁴

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.

By-laws and investments for resilient, net-zero retrofits and safe indoor temperatures

We applauded ECF's recognition in its report of June 24, 2024 that Building Emissions Performance Standards represent “the most critical” and “the most effective means of enabling city-wide emissions reductions.”⁵ The recognition that today we still face “a significant gap between anticipated emissions after planned climate actions are implemented, and the net zero by 2040 target,” makes it more urgent than ever to move toward putting this “most critical” and “most effective means” into action. We are concerned by the decision not to present a BEPS by-law for consideration, or to present a timeline for doing so.

While we support all efforts toward engaging other levels of government to fulfill their responsibilities, Toronto urgently needs by-laws and investments that can ensure life-saving building decarbonization—along with near-term health and resilience co-benefits—while holding tenants harmless. We suggest that ECF, with the support of Council, bring forward concrete proposals as early as possible in 2026, based on timely and meaningful consultations with a focus on equity-deserving communities. We suggest that ECF, with the support of Council, work with the

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/>.

⁴ National Academy of Science, Engineering & Medicine, *Understanding the Well-Being of LGBTQI+ Populations* (2020), <https://doi.org/10.17226/25877>. See also Statistics Canada, Socioeconomic characteristics of the 2SLGBTQ+ population, 2019 to 2021 (2024), <https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=1310087401>; 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”).

⁵ Item - 2024.IE15.4, Report from the Executive Director, “Environment & Climate Division, Building Emissions Performance Standards (BEPS): Design Principles and Development Plan,” at pp. 2, 3 (June 24, 2024), <https://secure.toronto.ca/council/agenda-item.do?item=2024.IE15.4>.



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Municipal Licensing & Standards (ML&S) Division and other stakeholders to coordinate this effort with urgent action to ensure safe indoor temperatures in rental housing, consistent with the City's human rights commitments.

Net zero equity indicators

We appreciate the inclusion of seven equity indicators focused on access to home energy loans, public transit, and trees, but encourage ECF, with the support of Council and other City partners, to identify and track additional equity indicators beyond these narrow dimensions. Additional equity indicators could, for example, examine equity with regard to:

- Access to other new infrastructure, amenities, or programs, such as green jobs training or placements, or EV charging stations.
- Access to other supports or incentives, such as for renters, building owners with low-income tenants, homeowners, or small businesses.
- Access to co-benefits of GhG reductions (e.g., outdoor/indoor temperatures, air quality).
- Rents, utility costs, and security of tenure for renters or small businesses (especially in relation to building retrofits and new neighbourhood amenities).
- Reach, engagement, language accessibility, and inclusivity of education campaigns.

We likewise encourage ECF and other City partners to include a range of equity and co-benefit indicators in their forthcoming resilience report and plans.

Net zero community programs and investments:

We offer the following comments on these topics:

- We support the objective of increasing young people's access to opportunities for **job and skills training** for youth in climate-related fields; environmental stewardship; and community space for climate action. We at The 519 are eager to identify opportunities to partner in this work, including ensuring welcoming and accessible opportunities for Newcomer, Black, Indigenous, and 2SLGBTQI+ youth.
- We likewise strongly support expansion of other investments and supports for **grassroots climate action**, including expansion of Youth Climate Action Grants, and establishment of a Black-led climate action grant program and a climate action incubator pilot.
- We support the concept of focusing **engagement and education efforts** through partnerships with existing community hubs and spaces and in neighbourhoods with higher equity needs. We encourage ECF and other City partners to consider Downtown and other neighbourhoods experiencing substantial inequality and rapid change as part of this lens, in addition to currently designated NIAs and Emerging Neighbourhoods, and to consider Association of Community Centres (AOCC) members as partners in this work.
- We support the proposed efforts to expand and strengthen the City's **circular economy** efforts, in alignment with the recently adopted Circular Economy Road Map. We at The 519 are eager to identify opportunities to partner in this work, and recommend proactively



engaging all AOCCs on these efforts. Going forward, we urge ECF and the Solid Waste Management Services (SWMS) Division to develop a more robust strategic framework and indicators focused on how circular-economy efforts will contribute meaningfully to Net Zero and community resilience goals.

- We support the stated goal to accelerate a rapid and significant reduction in **fossil fuel use in buildings**, including through expanding support programs, tools, and equitable home loans for building retrofits. We recognize that, as ECF stated in its June 24, 2024 report, BEPS represent “the most impactful means to enable the scale of action necessary for the decarbonization of Toronto’s building stock.”⁶ We recognize the challenging economic and policy environments, and we recognize that complementary efforts to support voluntary action are certainly needed prior to full implementation of BEPS. Yet is unclear how the City can accelerate fossil fuel reduction in a way that is truly “rapid and significant”—and thus mitigate serious near-future harms to City residents—absent these critical steps. We believe this plan would benefit from clear commitments on planned investments, and an assessment of how much change can likely be achieved through voluntary measures in the absence of BEPS. We are disappointed to see the postponement to 2027 of building data reporting, which are necessary to track progress.
- We also suggest that a critical component of voluntary retrofits—and a necessary correlate to BEPS—is expanding **financial incentives for retrofits in rental housing** without passing costs on to tenants. We hope to more specific plans along these lines.

Net zero corporate commitments:

We offer the following comments on this topic:

- We support the continued efforts of the Corporate Real Estate Management (CREM) Division and ECF to implement the **Net Zero Carbon Plan** for City-owned buildings. However, we remain concerned that these efforts are not adequately resourced. Additionally, we are concerned that the description of current retrofit plans in the Action Plan and Advanced Plan do not make clear how various figures cited regarding numbers of sites or emissions relate to one another or to the entire portfolio of City-owned buildings. In particular, these documents refer to the 465-building portfolio of CREM-managed buildings, and to the 1,325+ building portfolio of Toronto Community Housing (TCHC) buildings, but do not explicitly mention several hundred other City-owned buildings that fall into neither category but do fall under the Net Zero Carbon Plan. It is not clear whether these buildings are included in the breakdown of the Corporate Buildings Emissions Budget (Appendix 2, Table 2). It is likewise not clear what, if any, plans or timeline are contemplated for non-CREM-managed, non-TCHC buildings, including but not limited to AOCCs. We encourage CREM to provide additional clarity regarding these figures and analyses.

⁶ Item - 2024.IE15.4, Report from the Executive Director, Environment & Climate Division, “Building Emissions Performance Standards (BEPS): Design Principles and Development Plan,” at p. 6 (June 24, 2024), <https://secure.toronto.ca/council/agenda-item.do?item=2024.IE15.4>.



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- We also appreciate Council's recent support for the **AOCC Expansion Implementation Strategy**, calling for a multi-year plan that includes "reinvestment" to "modernize existing centres" as well as create new ones, to include "alignment with City priorities such as equity, sustainability, and climate resilience." Consistent with that Strategy and this Action Plan, we look forward to working with CREM and other City partners to ensure adequate planning support and funding for net zero transitions for all City-owned buildings, including AOCCs.⁷
- We support the proposal to **phase out City procurement and use of fossil-fuel powered equipment** in City-owned facilities by 2040. This is a fundamental step in ensuring effective Net Zero transition plans for City facilities. While fully phasing out fossil fuel combustion in City buildings will take time, it cannot be ensured without clear plans and timelines to stop installing equipment that effectively locks in dangerous emissions for years to come. City partners, including smaller Agencies such as the AOCCs, will need technical support and resources to implement this transition, but stand ready to collaborate on this work.
- We support continuing and improving the City's **Carbon Budget and Emissions Budget processes, accountability reporting, and Environmentally Responsible Procurement Policy**. We urge ECF, with support from Council, to offer support—including tools and advice available to other City Divisions and Agencies—to Agencies such as AOCCs, to assist them in participating in these processes or developing their own similar processes.

Conclusion

We reiterate our appreciation of the efforts of ECF, F&T, this Committee, and our other City partners to advance plans for the next phases of action to meet the City's commitments to lifesaving decarbonization and climate resilience. 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,

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⁷ Item EC24.2, Report from the Executive Director, Social Development, "Strategic Expansion of the Association of Community Centres in New Development Projects to Strengthen Toronto Communities," pp. 1, 9, 14 (Oct. 16, 2025), <https://secure.toronto.ca/council/agenda-item.do?item=2025.EC24.2>.