

June 28, 2019

Re: TAF's Comments on the Stakeholder Solutions Workshops for the HousingTO 2020-2030 Action Plan

Access to safe, secure, affordable, sustainable and well-maintained housing is a fundamental need for all Torontonians. TAF supports the council approved framework for development of the HousingTO Action Plan. Developing an effective housing plan that responds to this direction will require the plan to fully integrate other housing-related City priorities including energy efficiency, carbon reduction, and resilience. These priorities are deeply intertwined with the housing sector. Furthermore, these priorities are important pieces to solving the housing affordability puzzle.

Housing affordability is a complex and multifaceted challenge. While attention is usually focused on the cost of rents or home purchase and related mortgage costs, the focus needs to be on the total cost of housing. Utility costs are a significant component of total housing costs and can be dramatically reduced through energy and water efficiency. Achieving these savings, while challenging, is likely easier and simpler than achieving reductions in home purchase prices and market rents. Insurance is another significant component of housing costs, and is rising rapidly due to the increasing frequency of extreme weather events. Insurance premiums can also be reduced through various energy efficiency and resilience measures which qualify properties for discounts from a number of insurance providers. Mortgage insurance costs are also an important barrier to affordable home ownership, and energy efficient housing qualifies for significant mortgage insurance premium refunds through Canada Mortgage and Housing Corporation's Green Home program.

In addition to improving housing affordability, energy efficiency, carbon reduction, and resilience are important City priorities that are deeply linked with the housing sector. The City's TransformTO and Resilience strategies both contain housing related goals, targets and actions. TransformTO aims for all new buildings to be built to produce near-zero carbon emissions by 2030 and all existing homes and buildings to be retrofitted to improve energy performance by an average of 40 percent by 2050. This includes a priority focus on retrofitting low-income housing.

The Resilience Strategy recognizes the overlap between housing affordability and building resilience to the impacts of climate change. The Strategy calls for the new HousingTO 2020-2030 Action Plan to consider, among other things, "preparing the existing housing supply for extreme weather, including floods, heat waves and cold snaps." Taking actions to build resiliency in the housing stock will protect Toronto residents, and their homes, from being vulnerable to extreme weather events – and the costs associated with damage repairs. This is especially important for our most vulnerable populations, such as low-income families, that are disproportionately affected by extreme weather events.

¹ City of Toronto. (2019). Toronto's First Resilience Strategy.

Furthermore, energy efficiency and resilience improvements are also critical to ensuring a safe and well-maintained housing supply. Retrofits can improve comfort and indoor air quality, resulting in both direct and indirect health benefits for building occupants, including better mental health, better respiratory and cardiovascular health, reduced chronic disease and less temperature related illnesses and deaths.² As there is often a difficult trade-off between affordable housing and health and well-being, improved health outcomes are a key benefit associated with energy efficiency improvements. The increasing frequency and severity of extreme heat events is of particular note. Toronto Public Health estimates that "heat contributes to an average of 120 premature deaths in the city each year, and that heat-related mortality could double by 2050." Energy efficiency retrofits can substantially reduce exposure to extreme heat.

Energy efficiency, carbon reduction, and adaptation offer significant opportunities to improve housing affordability while addressing other council priorities around climate change, public health, and resilience. As such, these elements should be fully embedded in the HousingTO 2020-2030 Action Plan, in alignment with the TransformTO climate plan and targets and Toronto's Resilience Strategy. This should include development of specific goals, targets and actions to address energy efficiency, carbon reduction and resilience in the housing sector.

Thank you for your consideration in reviewing the TAF's comments. We look forward to continuing to work with the City to support the development of the HousingTO 2020-2030 Action Plan. Please don't hesitate to contact us directly should you have any questions.

Sincerely yours,

Bryan Purcell

VP Policy & Programs

The Atmospheric Fund (TAF) is a regional climate agency that invests in low-carbon solutions in the Greater Toronto and Hamilton Area and helps scale them up for broad implementation. We are experienced leaders and collaborate with stakeholders in the private, public and non-profit sectors who have ideas and opportunities for reducing carbon emissions. Supported by endowment funds, we advance the most promising concepts by investing, providing grants, influencing policies and running programs. We're particularly interested in ideas that offer benefits in addition to carbon reduction such as improving people's health, creating local jobs, boosting urban resiliency, and contributing to a fair society.

² International Energy Agency. (2014). Capturing the Multiple Benefits of Energy Efficiency. OECD.

³ Toronto Public Health, Climate Change and Health Strategy for Toronto, 2015. Available at https://www.toronto.ca/legdocs/mmis/2015/hl/bgrd/backgroundfile-81508.pdf