

**From:** [Lenka Holubec](#)  
**To:** [councilmeeting](#)  
**Subject:** EX17.1 Towards Recovery and Building a Renewed Toronto, City Council consideration on Oct 27, 2020\_submission\_Lenka Holubec  
**Date:** October 27, 2020 1:15:25 PM  
**Attachments:** [EX17.1 Towards Recovery and Building a Renewed Toronto, City Council consideration on Oct 27, 2020\\_submission\\_Lenka Holubec.pdf](#)

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Marilyn Toft  
12th floor, West Tower, City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2

To the City Clerk:

Please add this submission to the agenda of City Council consideration on Oct 27:

EX17.1 Towards Recovery and Building a Renewed Toronto, City Council consideration on Oct 27, 2020\_submission\_Lenka Holubec

I understand that this submission and the personal information in this email will form part of the public record and will be listed as a correspondent on agendas and minutes of City Council or its committees.

Also, I understand that agendas and minutes are posted online and my name may be indexed by search engines like Google.

If possible, please, make my submission public by inserting hyperlink.

Thank you,

Lenka Holubec  
  
  


Attached:  
EX17.1 Towards Recovery and Building a Renewed Toronto, City Council consideration on Oct 27, 2020\_submission\_Lenka Holubec

EX17.1 Towards Recovery and Building a Renewed Toronto, City Council consideration on Oct 27\_Submission\_Lenka Holubec

Oct 27, 2020

VIA E-MAIL: councilmeeting@toronto.ca

RE: EX17.1 Towards Recovery and Building a Renewed Toronto, City Council consideration on Oct 27, 2020

Dear Mayor Tory and Council Members,

Thank you for this opportunity to comment on this important item.

The Impacts & Opportunities Report from the Toronto Office of Rebuild and Recovery tackles a monumental task to address most pressing needs of the city population heightened by Covid-19.

*"Building back better means learning from the past and starting sustainable improvements that make a difference for future generations."*

Pg. 6, (October 6, 2020) Report from the City Manager on Towards Recovery and Building a Renewed Toronto\_backgroundfile-157345

Among urgent needs, this Report brings emphasis on crucial role played by parks magnified by the situation emerging under Covid-19.

The Impacts & Opportunities Report from the Toronto Office of Rebuild and Recovery sets Parks into the right perspective but omits to make distinction along its many recommendations between "any park" or "green space" and the city natural heritage.



[www.toronto.ca/planning/environment](http://www.toronto.ca/planning/environment)

Call 3-1-1

As it follows from **Attachment 2 - COVID-19 Impacts and Opportunities Engagement Summary\_backgroundfile-157347:**

**Importance of parks is ranked at 3<sup>rd</sup> place in terms of community priority:**

“Affordable housing and shelters 5,828 43%

Mobility, transit and transportation 4,096 30%

**Community spaces, parks and public spaces 3,539 26%”**

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**Attachment 1 - COVID-19 Impacts and Opportunities Report (Part 1)\_backgroundfile-157346(1)**

**Parks are included among 7 Critical City Services Pg. 97**

**7.7 Parks, Forestry and Recreation 112**

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The Report also mentions in **Theme: Climate Change and Resilience Other City strategies** that contribute to resilience and address climate change

**Environmental strategies:**

Long-Term Waste Management Strategy;

**Ravine Strategy;**

**Biodiversity Strategy;**

Strategic Forest Management Plan 2012-2022;

Tree Planting Strategy;

**Parkland Strategy**

Attachment 1 - COVID-19 Impacts and Opportunities Report (Part 3)\_backgroundfile-157352

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**At the same time, this over 237 pages long Report dedicates little space to important role big cities are now playing along biodiversity decline and corresponding urgent protection of urban public natural areas such as in Toronto Environmentally Significant Areas.**

Toronto’s outstanding natural areas that still retain the capacity to function as natural habitats are treasured by most and vital for Toronto’s vision of sustainable city and biodiversity.

Considering that the biggest threat we are facing is intertwined climate and biodiversity decline, this Report is to balance between population increasing need of parks and urgency to protect city biodiversity hotspots.

As we wish to *“build back better”*, encouraging public to learn how to enjoy these precious places to benefit our mental and physical health without causing harm due to inappropriate/not compatible use or overuse, would benefit biodiversity in Toronto.

Report is making recommendations (#36, #67), talking about booking parks and other greenspaces without making a clear distinction between “any park” or a “green space” and Toronto’s natural heritage – designated natural areas, Environmentally Significant Areas and designated ravines.

For example, Pg. 201, **The Need for Space** definitely needs disclaimer exempting natural heritage.

*“Additionally, the need to streamline permitting processes and to remove red tape related to City Planning and Toronto Building, approvals for*

*DIY pop-up spaces and **permitting processes for alternative use of public realm such as parks and streets**, are also paramount."*

Same applies to Pg. 214 **Opportunities** definitely needs disclaimer exempting natural heritage

*... "Participants called for a reconsideration of production practices to reduce the environmental footprint of the industry – especially in light of the added waste anticipated due to use of on-set PPE. A movement toward more sustainable productions can be a catalyst to create new programs to decrease waste, and even extend to clean energy adoption **via power drops on City properties such as parks.**"*

Pg. 218

*... "Encouraging the development of new spaces could be achieved by working with developers through Community Benefit agreements to create LGBTQ2S+ spaces in new developments. Other community spaces could be identified by working with the LGBTQ2S+ community to identify City-owned spaces (i.e. **parks and indoor spaces**) that could be made available. **Simplifying approval processes for permits and eliminating red tape will be essential to the community's ability to animate alternative spaces across the city.**"*

These recommendations need clarification about protected natural areas as these are being guided by special rules protection policies:

OPA 262, Section 3.4 Natural Environment, Policy 13 second and third paragraphs are amended by:

*"Development or site alteration, with the exception of trails, where appropriate, and conservation, flood and erosion control projects, is not permitted on lands within the natural heritage system that exhibit any of these characteristics. **Activities will be limited to those that are compatible with the preservation of the natural features and ecological functions attributed to the areas.** New or expanding infrastructure should be avoided unless there is no reasonable alternative, adverse impacts are minimized and natural features and ecological functions are restored or enhanced where feasible. An impact study, as referred to in Policy 12, will be required for any proposed undertaking in those areas not already the subject of an Environmental Assessment under the Environmental Assessment Act."*

**I recommend that:**

**City Council direct the City Manager to review The Impacts & Opportunities Report from the Toronto Office of Rebuild and Recovery and report to City Council on clarification of terms in respect to protected natural areas as these are being guided by special rules protection policies**

Thank you for your attention to these comments.

Sincerely,

Lenka Holubec, member of ProtectNatureTO

[OPINION: As we speak of plans for economic recovery and health through COVID-19, included must be funding and policy to safeguard and grow our parks and urban green spaces](#)

*"As we speak of plans that will chart our way to economic recovery and health through COVID-19, included in these must be funding and policy to safeguard and grow our parks and urban green spaces — for this is where we will instinctively go to heal once this pandemic ends and to stay healthy when the next crisis, personal or global, comes. It is essential for our health that we continue to connect with nature, and that we protect and expand the safe, accessible places we have to do so."*

*Let us remember who waited quietly, with leafy, open arms when we had nowhere else to turn. And let us build a stronger, more resilient society today by staying physically distanced and connected to nature."*

(written by Dr. Melissa Lem, a Vancouver family physician, board member of the Canadian Association of Physicians for the Environment and director of Parks Prescriptions for the B.C. Parks Foundation and Robin Edger, the executive director of the Canadian Association of Physicians for the Environment)

## Background Information:

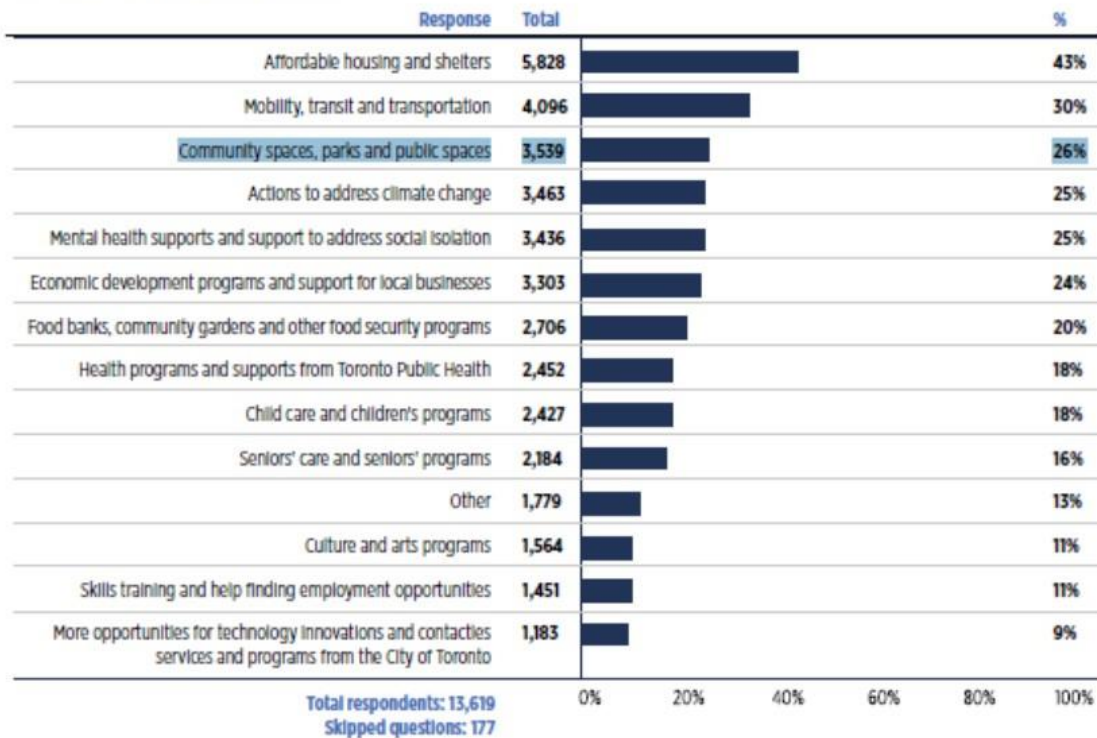
### Attachment 2 - COVID-19 Impacts and Opportunities Engagement Summary\_backgroundfile-157347

## Sample Survey Findings

Below are a number of graphs highlighting a few key questions from the public survey as well as the one undertaken for the City by Social Planning Toronto. Datasets for all questions and all surveys will be posted to [www.toronto.ca/Open](http://www.toronto.ca/Open).

**A.** This graph represents the responses to the first question in the public survey that asked respondents to select the three top priorities that they, their community, organization or business needed to effectively recover and rebuild.

**What are the priorities for you, your community, organization or business to effectively recover and rebuild?  
Please select up to three (3) choices.**



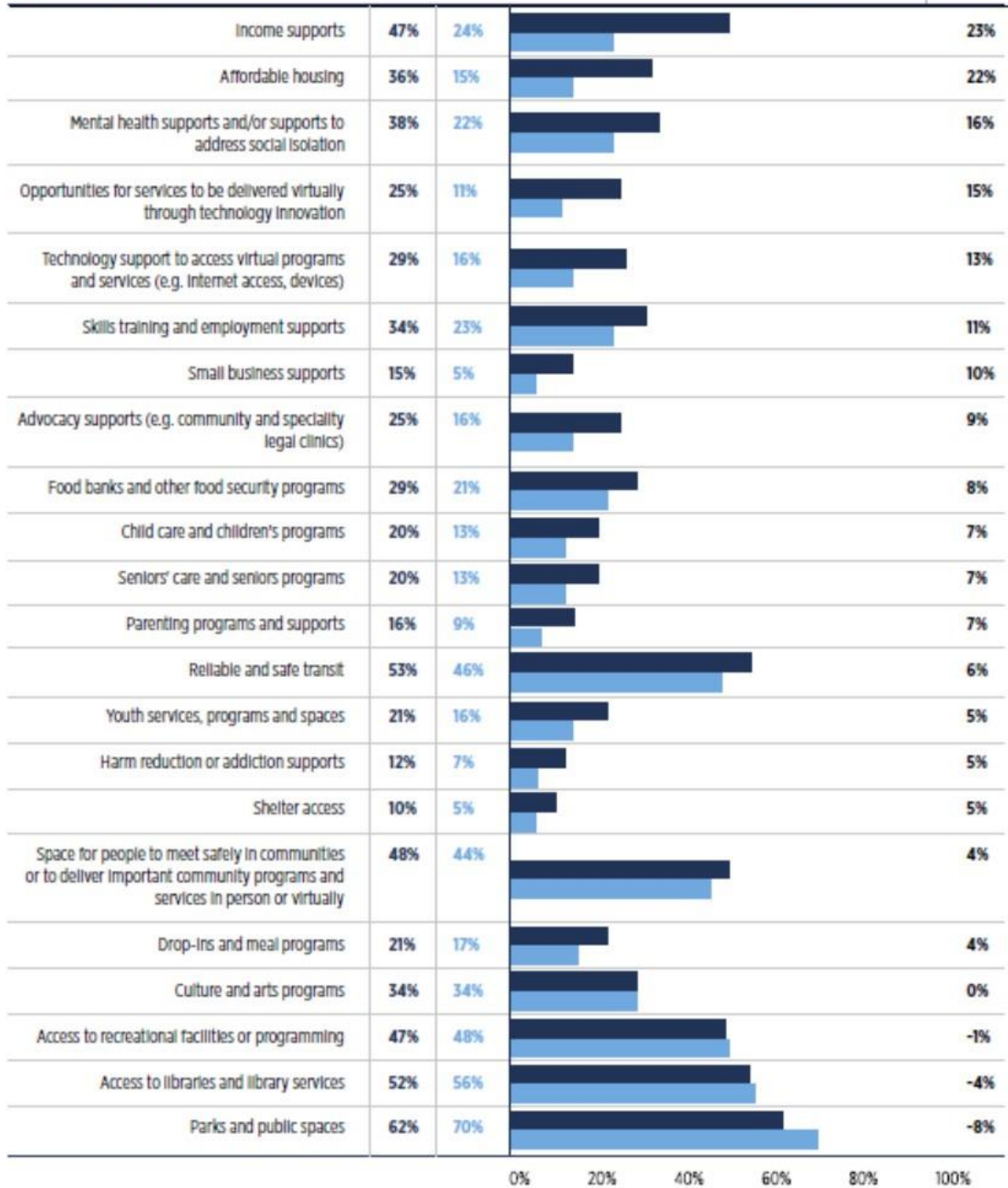
F. This graph represents the responses to the survey, conducted by Social Planning Toronto on behalf of the City, on the supports respondents required prior to COVID-19 and during the pandemic.

**Supports Accessed Before COVID-19 vs Supports Urgently Needed**

**Urgently needed in next 0-6 months**  
Answered: 932 Skipped questions: 33

**Accessed before COVID-19**  
Answered: 928 Skipped questions: 37

**Difference**



# Nature

## INTRODUCTION

Biodiversity is the splendour of life on this planet—the intricately linked mix of flora and fauna that sustains us. And yet biodiversity is under threat due to degraded and fragmented habitats from urbanization and increased ecosystem stress from climate change.

In 2017, the World Wildlife Fund-Canada reported that 50% of monitored species in Canada are in decline, including federally protected at-risk species. And Canadian researchers have warned that bee populations are in severe decline, putting at risk the pollination required by nearly 75% of food crops.

In Canada, some of the areas most rich in biodiversity are also the areas most densely settled, making biodiversity both an urban challenge and opportunity. As places where nature and people come together in cities, our local parks have a large role to play in protecting and enhancing biodiversity—and increasing our understanding of its importance to our planet and to our lives.

That's why we've focused this section on a special look at urban biodiversity, diving deep into its impacts on our well-being, how small spaces add up to big impacts, why we need to increase habitat connectivity, and what we can do to deepen the conversation.

The COVID-19 pandemic has only bolstered arguments for the importance of access to nature and healthy ecosystems. Stories from across the country showed how people found new relief in exploring natural spaces, running outdoors, and using parks to decompress.

As the stories in this section show, biodiversity is a key ingredient in the resiliency of both our ecosystems and our mental health.



# Nature

## INSIGHTS

- \* Nearly two thirds of cities reported protecting biodiversity and enhancing natural areas as a top challenge, while only 1 in 5 reported having a citywide biodiversity strategy in place.
- \* Nature experiences are in demand as 70% of cities reported increasing demand for park naturalization projects and 56% of cities reported increasing demand for volunteer stewardship opportunities.
- \* As extreme weather continues to impact parks, nearly three quarters of cities reported increasing demand for green infrastructure like rain gardens and bioswales that can help mitigate impacts, but few cities have citywide green infrastructure strategies in place that include parks.

## TAKE-AWAYS

- \* Recognize and promote the psychological well-being benefits of biodiversity and use public health as a "doorway" to bring new people into the conversation, especially as the COVID-19 response turns to addressing an increasing mental health crisis.
- \* Leverage the attachment people have to their local neighbourhoods to promote small-scale projects like pollinator gardens that make urban biodiversity tangible for people, and use them as springboards into wider environmental conversations.
- \* Work towards the protection and restoration of natural spaces—large and small—but ensure they are also connected through biodiversity corridors at the multiple scales of neighbourhood, city, and region.



## Nature / Indicators

**19%**

of cities have a citywide biodiversity strategy and 52% of cities have biodiversity objectives embedded within other environmental plans.

*This year we separated standalone biodiversity strategies from other city environmental plans that contained biodiversity objectives, suggesting there is more work to be done to create holistic citywide urban biodiversity strategies.*

**63%**

of cities listed protecting and enhancing biodiversity and natural environments as a top challenge.

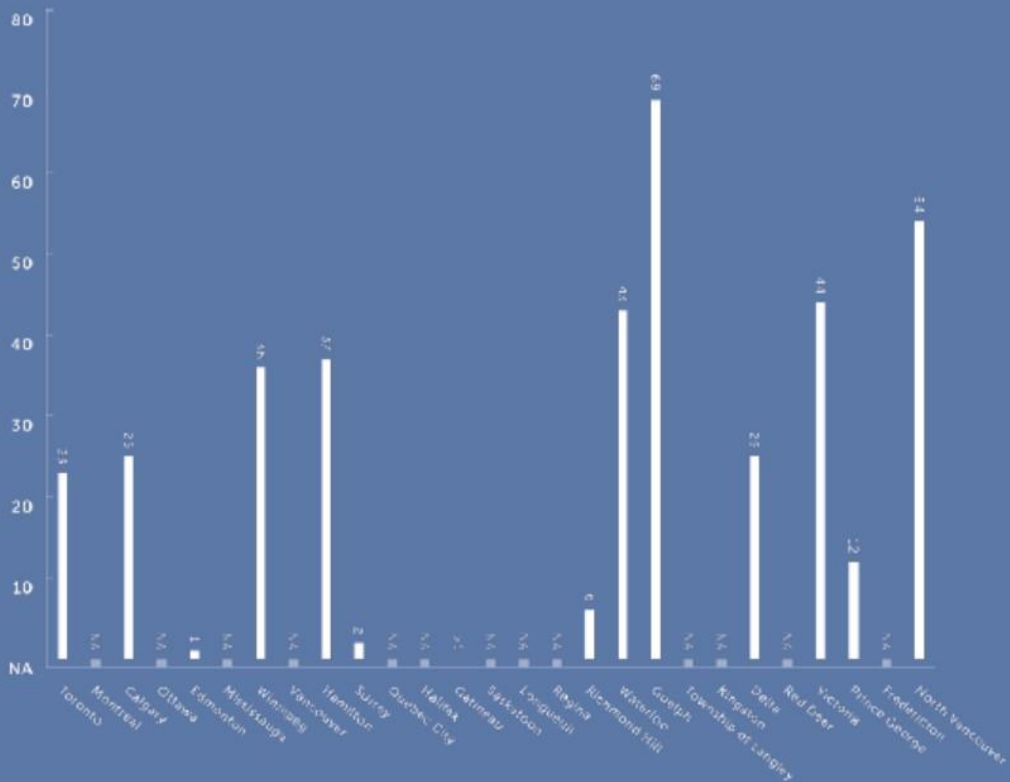
**70%**

of cities reported increasing demand for park naturalization projects.

**74%**

of cities reported increasing demand for green infrastructure like bioswales and rain gardens.

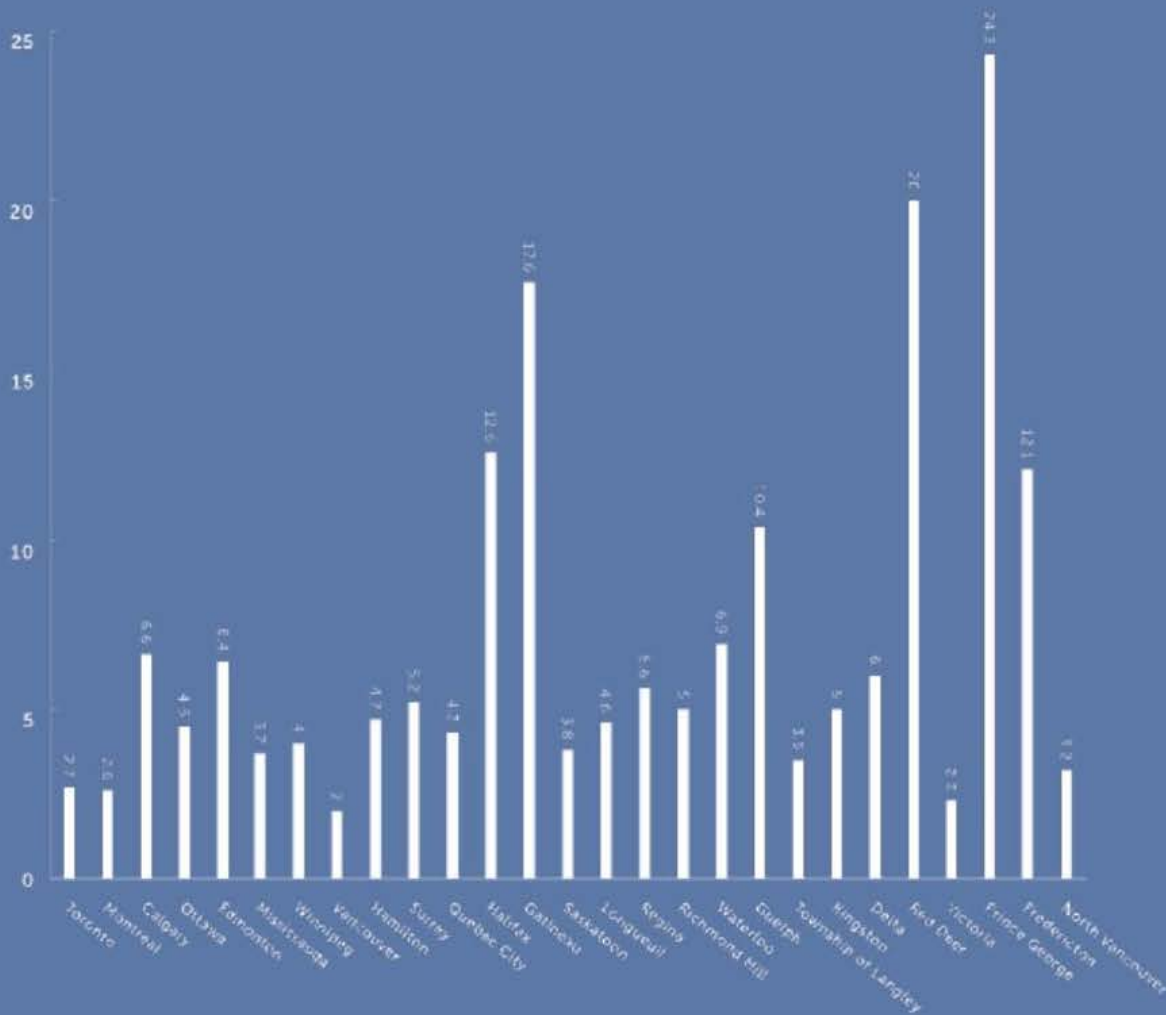
# Nature / % of parkland that is environmentally significant/protected



This chart shows the percentage of total city parkland that is under special protection as ecologically sensitive. While the policies are different in each city, it gives a sense of the quantity of protected urban habitat—8,300ha in total or equivalent to nearly 21 Stanley Parks—a number that could help contribute to Canada's target of 17% protected land in the country.

*\*Arranged by population size*

# Growth / Ha of parkland / 1000 people



This chart shows the amount of parkland for every 1,000 residents. While there is no "correct" amount of parkland per population as it depends on local context, Canada's major urban centres have similarly lower levels of parkland per population as they deal with higher densities and development pressures. Ensuring these numbers do not decrease as populations grow will be key to meeting future parkland needs.

*\*Arranged by population size*

### INSIGHTS

- \* Consistent with 2019, the top challenges cities reported were aging infrastructure, acquiring parkland to meet growth needs, and insufficient operating budgets. However, just 63% of cities reported having updated park system plans to address growth.
- \* COVID-19 has accelerated actions to convert streets to public space—both temporary and permanent—as cities seek to expand the amount of room for people to gather outdoors.
- \* While there is a combined \$441 million in capital dollars budgeted towards new and upgraded parks in 2020 (Toronto and Vancouver make up more than half of that total), cities are grappling with the financial impacts of COVID-19, which will likely impact park development budgets and timelines.

### TAKE-AWAYS

- \* Both for immediate COVID-19 relief and longer-term transformations, broaden the view beyond parks to include streets, laneways, hydro/rail corridors, schools and other open spaces as part of a connected network of temporary/permanent public spaces.
- \* Prepare to study new management models, funding arrangements, and equity-based development tools as new park development relies more on partnerships between different landowners, community organizations, and government agencies/departments.
- \* Ensure long-term park system planning balances improving the performance and quality of existing parks with identifying growth areas to acquire land ahead of development.

Natural areas give form and identity to the city and provide habitat for flora and fauna. Some offer opportunities for recreation and leisure. Their natural beauty promotes an appreciation for nature and provides relief from the hard surfaces of the city. Natural areas also provide many ecosystem services needed for human health and well-being such as air and water purification.

#### **Environmentally Significant Areas**

Environmentally significant areas (ESAs) are areas of local and regional environmental significance. These areas contribute disproportionately to biodiversity in Toronto. They provide habitats for rare, threatened or endangered species, and contain unusually large or diverse habitats or rare or unusual landforms. They serve as wildlife migratory stopover locations, concentration points or water storage and recharge areas. The Official Plan requires that ESAs be identified and protected.

Eighteen ESAs are designated in the Official Plan. Dozens of additional sites across the City have been identified and are expected to be added to the Official Plan through amendment. The majority of areas that meet the ESA criteria are located within publicly owned parkland in valleys and ravines and along the waterfront. Where these are located within the public parks system, park planning, management plans, budgets and enhanced operating practices will be required to protect these areas and ensure that their use is compatible with the preservation of their natural features and functions.

Toronto's Official Plan outlines that strong communities and a competitive economy need a healthy natural environment. It sets policies and land use designations that protect, restore and enhance the natural environment. The city's natural heritage system is a mosaic of natural features and functions that includes significant features such as landforms, watercourses and associated riparian (riverbank) zones, valley slopes and floodplains, forests, wetlands, meadows, beaches and bluffs. These habitats support an impressive variety of plants and animals including significant species and provide many irreplaceable ecological functions.



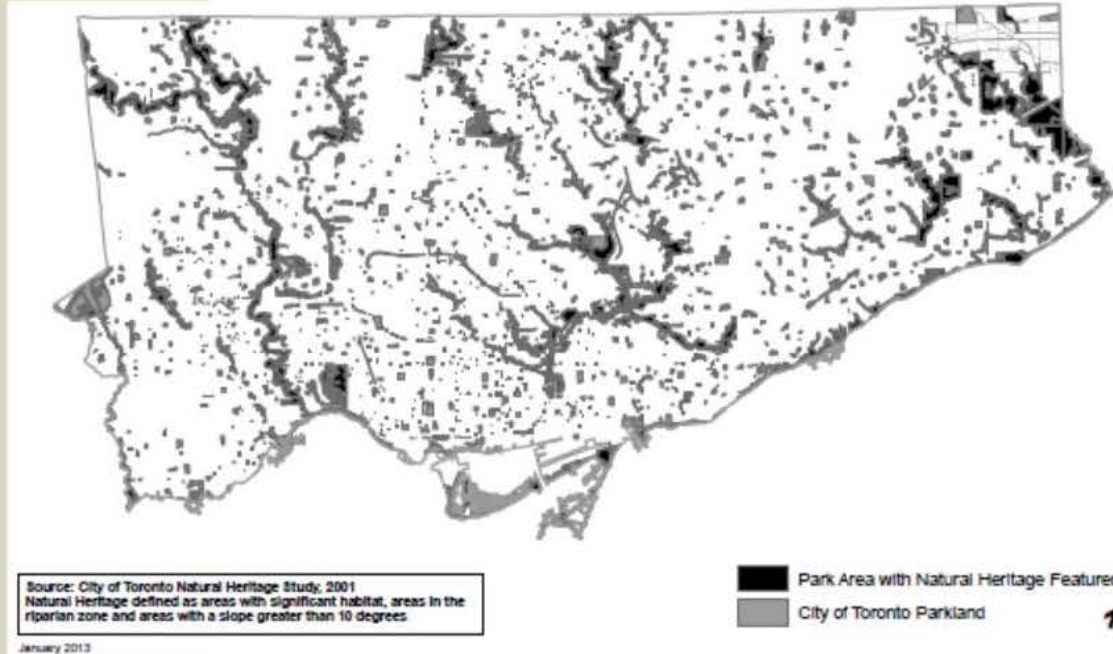
"The ravines are to Toronto what canals are to Venice, hills are to San Francisco and the Thames River is to London. They are the heart of the City's emotional geography, and understanding Toronto requires an understanding of the ravines."

*Accidental City, Robert Fulford*

"It is wonderful to have these oasis places especially with the growing inner city density and life in high rises. It is very important for air quality too."

*Consultation participant*

Map 4: City of Toronto Parkland with Natural Heritage Features (2013)



Protecting the natural heritage system from encroachment and inappropriate uses is important given the relatively small amount of natural area that remains in Toronto. With the city's population expected to grow to 3 million residents by 2031<sup>21</sup>, there will be growing pressure on natural areas as people seek out opportunities to experience nature. A challenge will be to ensure that natural parklands and the significant natural areas within them continue to function and flourish so that they can be enjoyed by future generations.

#### Natural area management

Parks, Forestry and Recreation leads natural area management on City of Toronto parkland. Natural area management involves close collaboration with the Toronto and Region Conservation Authority (TRCA), Ontario Ministry of Natural Resources (OMNR) and other City divisions, such as City Planning, Toronto Water and Transportation Services. Ideally every natural area should receive natural area management and monitoring on a regular basis. However, limited resources mean that attention is focused on areas of known priority and threat, for example those with rare species.

A key challenge for natural area planning and management is making decisions that produce the best quality experience for residents and visitors while protecting the ecological integrity of the natural environment. As Toronto's population grows and pressures on natural areas increase, achieving this balance is increasingly difficult. Current natural area management issues include:

- Rising recreational and other use pressures
- Insufficient infrastructure to direct activity away from sensitive sites
- Impacts of climate change, such as extended seasons, extreme weather and spread of new invasive species

- Limited public awareness of how to respect the natural environment and the value of natural areas
- Encroachment by private landowners onto parkland, for example the extension of structures or fill onto parkland

### Heavy use and sustainability

Rising population density and limited opportunities for parkland growth are resulting in more people using the City's parkland. This is, for the most part, a positive trend that can be supported by adjusting maintenance practices and the design and distribution of park features and amenities. In some settings, however, overuse or misuse negatively affects the quality and sustainability of parkland. Natural areas are vulnerable to heavy use, as they have low 'wear tolerance' and natural ecosystems deteriorate relatively quickly under conditions of overuse. Other park spaces, such as sports fields and popular event sites are also affected. High demand for soccer, cricket and other sports leaves many existing fields in poor condition from intensive overuse, and large or frequent events can strain the overall park environment.



Natural environments have a threshold (or "tipping point") for disruption beyond which severe and possibly irreversible damage is done to ecological health. Knowing where thresholds exist and when they are reached is important for understanding and managing the impacts of use. It allows for the development of early warning systems to identify at-risk locations so that timely action can protect them.

I have attended festivals in parks and unfortunately this is very damaging to the trees and grasses. I think Toronto needs a number of festival sites for festivals so that the parks don't sustain a lot of damage.

Consultation participant

The use of parkland needs to be compatible with its physical capacities. Parks, Forestry and Recreation currently has little data on how many people use city parks, how parks are used, and how high levels of use impact parks. This makes it challenging to prevent issues that might arise and as a result problems are dealt with case-by-case, often once damage has already been done.

### Case study: Impact and cost of overuse in Queens Park North

Queen's Park North is a tremendously popular event site. While past numerous events created a sense of vibrancy, they strained the physical environment, stressed the tree canopy, compacted the soil, and damaged turf, pathways and park amenities. Some of this damage was a result of event organizers not adhering to permit conditions, such as keeping vehicles out of the park. The City of Toronto issued a moratorium on permits in this park for 2012 so that restoration work, at a cost of over \$600,000, could take place. It was concluded that permitting the park for events in the future needs to be based on ecological markers (e.g. tree roots exposed by soil compaction), the condition of park amenities, soil conditions, weather and overall use levels.

## Toronto Official Plan, Chapter 2

### Public Accessibility, 2-26

#### Public Accessibility

A key city-building principle is that public buildings, parks and open spaces should be open and accessible to all members of the public, including people with disabilities.

New development and ongoing maintenance and improvements of our public buildings and parks and open spaces should recognize this goal. As with all general principles, there are important exceptions:

- Some public buildings and open spaces perform functions that are incompatible with wide-open public access for example, water treatment plants and waste transfer stations.

- **In some of our natural heritage areas, public access will damage natural features and functions.**

- **In other areas severe topographical features such as ravines and bluffs are largely inaccessible today and in the absence of benign, non-intrusive technology, making them accessible would be impractical.**

Providing universal accessibility is one of many public expenditure priorities facing the City. Balancing the benefits and costs in individual cases will have to be carefully evaluated to ensure that our scarce dollars are wisely spent.

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### 3.1.5 HERITAGE CONSERVATION

3-12

“The conservation of natural heritage is also an important element of heritage conservation in Toronto. The Official Plan provides for the conservation of Toronto’s urban forest, ravines and river valleys in policies protecting the Natural Heritage System contained in Section 3.4 and Map 9 of the Plan. The conservation of important heritage resources includes those policies protecting Toronto’s Natural Heritage Areas.”

### 3.2.3 PARKS AND OPEN SPACES

3-28

“Our exceptional system of green spaces helps make Toronto a healthy and livable City. The City’s Green Space System, made up of parks and open spaces, the natural heritage system and a variety of privately managed but publicly accessible spaces, is an integral part of our quality of life and social well-being. It provides opportunities for recreation, relaxation and experiencing nature in peace and quiet and contributes to Toronto’s competitive advantage as a place to invest.”

### 3.3 BUILDING NEW NEIGHBOURHOODS

3-31

#### Policies

1. New neighbourhoods will have a comprehensive planning framework reflecting the Plan’s city-wide goals as well as the local context. The framework should include:

- a) the pattern of streets, development blocks, open spaces and other infrastructure;
- b) the mix and location of land uses;
- c) **a strategy to provide parkland and to protect, enhance or restore natural heritage;**

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OPA 262, BY-LAW No. -2015 To adopt Amendment No. 262 to the Official Plan of the City of Toronto with respect to the Environmental Policies and Designation of Environmentally Significant Areas.

<https://www.toronto.ca/legdocs/bills/2015/bill1173.pdf>

Section 3.4 Natural Environment, Policy 13 second and third paragraphs are amended by:

**"Development or site alteration, with the exception of trails, where appropriate, and conservation, flood and erosion control**



projects, is not permitted on lands within the natural heritage system that exhibit any of these characteristics. Activities will be limited to those that are compatible with the preservation of the natural features and ecological functions attributed to the areas. New or expanding infrastructure should be avoided unless there is no reasonable alternative, adverse impacts are minimized and natural features and ecological functions are restored or enhanced where feasible. An impact study, as referred to in Policy 12, will be required for any proposed undertaking in those areas not already the subject of an Environmental Assessment under the Environmental Assessment Act.

**Known areas exhibiting these environmentally significant characteristics are shown on Map 12A.** Where these areas extend onto lands above the top of bank which have underlying zoning permissions, the lands may be used to calculate permissible density in the zoning bylaw. An impact study, as referred to in policy 12, will be required for any proposed development adjacent to these areas. Any proposed development will avoid these areas, minimize negative impacts and, when possible, restore and enhance the ecological functions attributed to these areas."

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### "Biodiversity

Biodiversity refers to the rich variety of life forms and the critical roles they play within varied ecosystems. Ecological health is related to healthy biodiversity. The greater the biodiversity of a defined geographic area, the greater the ecological health and resiliency of that area. **Policies protecting and enhancing the natural heritage system are a key pillar of biodiversity conservation within Toronto. The biodiversity found in small green spaces, street trees, green roofs, community gardens, hydro corridors, cemeteries, and backyards also play an important role in our urban ecosystem.** The City of Toronto's Biodiversity Series provides detailed information on the flora and fauna found in the City, fostering awareness and stewardship of local biodiversity."

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### Parkland Strategy

pg.19

Toronto's Ravine System,

**"Toronto's ravine system provides important wildlife habitat, and support biodiversity and climate change resiliency. The Official Plan identifies that these lands should be retained and preserved in a natural state. This allows for some compatible recreational programming, while ensuring adverse impacts on natural features and functions are minimized. As a result, use of Toronto's ravines and natural parklands is generally limited to passive recreation opportunities including trail-based activities (e.g. walking, hiking, running, cross-country skiing, snowshoeing, and cycling), immersive experiences within nature, opportunities for rest and relaxation, and wildlife viewing."**