



December 12, 2021

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

**RE: IE26.6 Actions to Reaffirm Toronto's Tree Canopy Target.**

Dear Mayor John Tory and Members of City Council,

This is to express our strong support for IEC's recommendation that City Council reaffirm Toronto's target of 40 percent tree canopy cover by 2050 to align with the City of Toronto's TransformTO NetZero Strategy. However we strongly feel that mere reaffirmation of the 40 percent tree canopy target is **inadequate and ineffective**. We have to:

- (1) actually protect the private trees that are of protected size;
  - (2) strengthen the Tree Protection By-laws,
  - (3) increase enforcement of the existing (and hopefully enhanced) Tree Protection Bylaws
  - (4) Increase replacement planting when trees are to be removed.
- and
- (5) maintain and enhance the existing protection for soft landscaping in the Zoning Bylaws

**1. Actually protect the private trees that are of protected size**

Municipal Code Chapter 813 - Trees does not prevent the injury to or removal of protected trees for as-of-right development.

It is recommended:

- *That the Municipal Code Chapter 813 – Trees be amended to prevent the ability to injure or remove protected trees on the property where infill development is being applied for (and adjacent trees on neighbouring properties).*

**2. Strengthen the Tree Protection By-laws**

Toronto's Tree Protection By-law only protects trees of greater than or equal to 30 cm. diameter (DBH). Other municipalities, such as the cities of Cambridge and Burlington, protect trees of 20cm. diameter or 15cm. (Oakville, Mississauga)

It is recommended:

- *That the Toronto Municipal Code – Chapter 813 be amended to protect trees of diameter (DBH) greater than or equal to 20cm.*

**3. Increase enforcement of the existing (and hopefully enhanced) Tree Protection Bylaws**

It is recommended:

- That the City Increase enforcement of the existing (and hopefully enhanced) Tree Protection Bylaws

**4. Increase replacement planting when trees are to be removed.**

Currently Toronto has a 1:1 replacement planting when private, healthy trees are removed, regardless of size.

It is recommended:

- *That the City (significantly) increase the required replacement planting ratio.*

**5. Maintain or enhance protection for soft landscaping in the Zoning Bylaws**

We oppose the proposed reduction of the soft landscaping requirement in the Laneway Suites by-law. As such we support the IEC recommendation:

- *That City Council request the General Manager, Parks Forestry and Recreation, in consultation with the General Manager, Transportation Services and the Executive Director, Municipal Licensing and Standards, to report back on any recommendations for enhanced enforcement of the requirement for soft landscaping on the City right-of-way or private property as set out in the City's Zoning By-law.*

Thank you for consideration of our recommendations

Yours truly,

Geoff Kettel  
Co-Chair, FoNTRA

Cathie Macdonald  
Co-Chair, FoNTRA

Cc: Janie Romoff, General Manager, Parks, Forestry and Recreation  
Kim Statham, Director, Urban Forestry, Parks, Forestry and Recreation Division  
Teresa Bosco, Acting Manager, Forestry Policy and Planning, Parks, Forestry and Recreation  
Connie Pinto, Program Standards and Development Officer, Urban Forestry, Parks, Forestry and Recreation

**The Federation of North Toronto Residents' Associations (FoNTRA)** is a non-profit, volunteer organization comprised of over 30 member organizations. Its members, all residents' associations, include at least 170,000 Toronto residents within their boundaries. The residents' associations that make up FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal.