

**From:** [Jean-Francois Obregon Murillo](#)  
**To:** [Executive Committee](#)  
**Subject:** Communication for Ex 34.3 - Growth Funding Tools - Alternative Parkland Dedication Rate  
**Date:** July 11, 2022 8:57:04 AM

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Dear Executive Committee,

I'm supportive of Staff's recommendations under this item and ask that you please approve it at this meeting. I'm a recent graduate of Toronto Metropolitan University's (formerly Ryerson University) Master of Planning program. My major research paper focussed on new financial tools for the Cash-in-lieu mechanism for parkland acquisition in the City of Toronto. I spent considerable time studying the strengths and weaknesses of the City's Alternative Parkland Dedication Rate.

The current Alternative Parkland Dedication Rate has been in effect since 2007 and is focused on site size, which has left money on the table when it comes to parkland dedication. The density-responsive proposed By-law would yield more parkland in new construction, which would offer immeasurable benefits for residents like improved mental health and biodiversity. The World Health Organization recommends an ideal parkland dedication rate of 50 m<sup>2</sup> per person. (Maryanti et al., 2016) According to the Parkland Strategy 2022, there will be an estimated 25 m<sup>2</sup> of parkland per person by 2034 in Toronto compared with 28 m<sup>2</sup> in 2016.

It is reasonable for Staff to ask for greater consultation in the context of changes in the province's Bill 109, which will eat away at future parkland dedication, especially around Ontario Line stations. Bill 109 asks for implementing a "tiered alternative parkland dedication rate for Transit-Oriented Communities (TOCs) to provide increased certainty of parkland requirements". It further states that sites less than or equal to 5 hectares would have parkland dedicated up to 10% of the land or its value; and, for sites greater than 5 hectares, parkland would be dedicated up to 15% of the land or its value. In practice, Bill 109's changes would lead to less parkland, since in higher-density, mixed-use areas, an alternative rate is used to obtain parkland, which is currently 1 hectare of parkland per 300 units exclusive of open space. What would this mean for Mayor Tory's legacy projects like University Park?

It is worth highlighting the flood mitigation features of parks. Heavy rainfalls in September 2018 caused flooding in Scotiabank Arena, Union Station and SkyDome, causing \$80 million in insured damages. (Insurance Bureau of Canada) The proposed density-responsive rate will lead to larger parkland dedications, which will provide added green infrastructure with flood mitigation features. I used to research this issue as a former ESG analyst focused on the financial sector and there is a shared interest between cities and insurers for more flood mitigation. An "ounce of prevention is worth a pound of cure" as the expression goes, particularly around future Ontario Line stations, where flooding would be disruptive for riders. As Toronto continues to build, any added green space that can be secured will help cope with the increasing frequency of severe rain storms in the future. Montreal and New York are doing this. Increased green space will help to save flood damage costs and economic disruptions for the City of Toronto, residents, businesses, and other levels of government. The Don Mouth Naturalization and Port Lands Flood Protection Project is a prime example of where this foresight is being applied.

It was not long ago that many in Toronto sought refuge in parks to cope with the public health restrictions associated with COVID-19. Anecdotally, many who move to Toronto cherish its

parks. Let's embrace our identity as a Park City and support Staff with their recommendations. I ask that you keep my letter in mind when considering the recommendations in this Executive Council item.

Thank you for your time and attention.

Best regards,  
Jean-François, HBA, MPI 2022  
Principal, The Urban Hulk