



Toronto City Hall
100 Queen Street West, Suite B31
Toronto, ON M5H 2N2

November 29, 2023

Re: PH8.6 Growing Space for Trees: Protecting and Enhancing the Tree Canopy While Supporting Infill Housing

Dear Councillor Perks, Chair and Members of the Planning and Housing Committee,

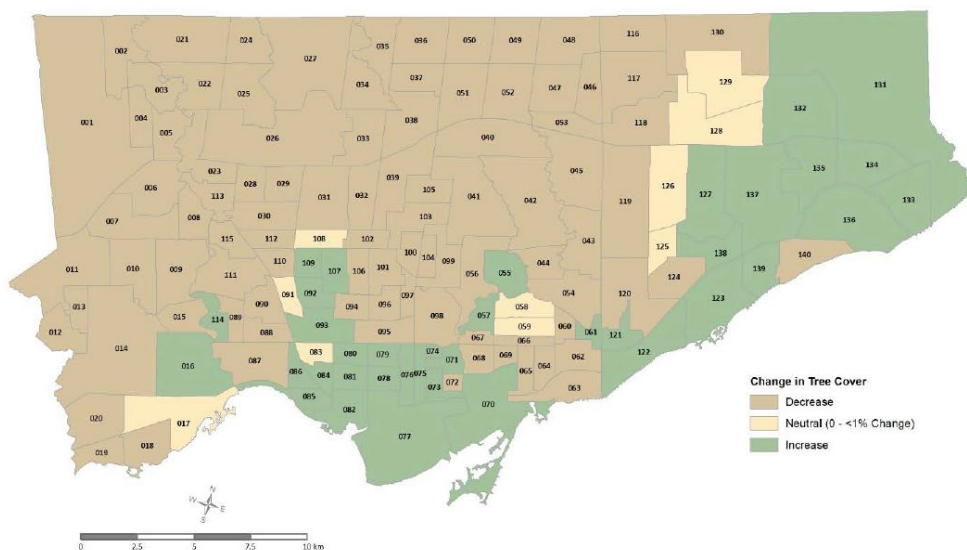
Ensuring that Toronto achieves the goal of 40% tree canopy by 2050 is the City's commitment to the well-being of its residents, the health of its environment and to building climate resilience. The benefits of a greener city and preserving and growing the valuable asset of Toronto's urban forest - public green infrastructure - are undeniable. These benefits include mitigating the "urban heat island" effect, fostering a stronger sense of belonging and improving mental health, improving the air we breathe through absorbing harmful pollutants and releasing oxygen into the atmosphere, improving water filtration, reducing stormwater runoff, carbon sequestration and much more.

The report "Growing Space for Trees: Protecting and Enhancing the Tree Canopy While Supporting Infill Housing" identifies that proactive solutions are needed as new infill housing has the potential to negatively impact the tree canopy and reduce the amount of suitable growing space for trees.

We support the need for these proactive solutions, in particular strengthening the protection of healthy existing trees and growing space for trees in Toronto.

According to the City's 2018 Tree Canopy Study, tree canopy in low rise residential lands decreased from approx. 35% in 2008 to 31% in 2018. More than half of Toronto lost tree cover over the past 10 years (map area in brown below). This is heading in the wrong direction when 40% tree canopy cover is the goal reaffirmed by Council in December 2021. (IE26.6)

Tree Cover Change by Neighbourhood



Growing spaces for trees are being lost as hard surfaces in the city are increasing. The equivalent of 1,115 soccer fields were converted to hard surfaces in the last 10 years. (2018 Tree Canopy Study) Figure 1&2 provides one example of the unfortunate impact on trees when this happens.

Two years ago on December 16, 2021, City Council directed City staff to study the correlation between parcels of land with building permits and those exhibiting tree cover loss and report back in the 2nd Quarter of 2022.

Staff were also to report back on any recommendations for enhanced enforcement of the requirement for soft landscaping at that time as set out in the City’s Zoning By-law. (IE26.6 Actions to Reaffirm Toronto’s Tree Canopy Target)

In the February 1, 2022 report from the Chief Planner and Executive Director, City Planning the Planning and Housing Committee it was acknowledged that the potential impacts on growing space and the urban tree canopy resulting from infill housing development was raised as a concern repeatedly through the EHON consultation process. That same report stated that in January 2022, staff in City Planning, Urban Forestry, Toronto Building, City Legal, the Environment and Energy Office, and others convened the “Tree/House Working Group” to respond to Council’s Direction in December 2021.

“This Group will meet throughout 2022 in preparation of recommendations for City Council in 2023, or earlier, to support both the City’s tree canopy and opportunities for new urban infill housing. The group will develop and execute a community consultation plan.” The action was to be a report back in the first quarter of 2023.

The list of Motions where Action Dates have been committed to and missed are listed below.

Table 1: Summary of Motions Directing Action on Tree Canopy Preservation and Enhancement

<i>Date</i>	<i>Item</i>	<i>Action Due By</i>
Mar 26, 2018	PE25.1 Tree Protection through the Committee of Adjustment Process	Ongoing
Oct 1, 2021	MM36.31 Strengthening Tree Protection	Not specified
Dec 15, 2021	IE26.6 Actions to Reaffirm Toronto’s Tree Canopy Target	Q2 2022
Dec 15, 2021	PH29.2 Changing Lanes: The City of Toronto’s Review of Laneway Suites – Monitoring Program and Zoning By-law Amendments – Final Report	Q1 2023 or as soon as possible
Feb 2, 2022	PH30.2 Expanding Housing Options in Neighbourhoods – Garden Suites – Final Report	Feb 2024 or earlier
Feb 15, 2022	PH31.6 Expanding Housing Options in Neighbourhoods – Update Report	Q1 2023
May 25, 2022	IE30.18 Report on Pervious Planting Spaces on Private Property	Before City Council provides further guidance on EHON
May 10, 2023	PH3.16 Expanding Housing Options in Neighbourhoods: Multiplex Study - Final Report	Q3 2023

Given how long City Council has been directing and passing motions asking for analysis and proactive solutions to protecting trees and growing space, we find the timing for action in this report too long and request the following:

That the members of the Planning and Housing Committee request staff to:

1. **Accelerate the timing** for the recommendations for protecting existing trees and expanding the tree canopy. As these were due as far back as Q2 2022 the recommended timing of Q4 2024 is too long. We ask that analysis, stakeholder consultations and reports with recommendations be brought forward to Q2 2024 to give this the urgency required.
2. **Clarify the requirements for a complete Committee of Adjustment** application to include:
 - a. A completed tree declaration form but there should also be fines associated for incomplete or inaccurate tree declaration forms. Currently there are none.
 - b. Agree that up to date (specify within the past 12 months) colour photos are needed, including colour photos of individual trees in full leaf.
 - c. Agree that site plans need to show the location of all by-law protected trees and tree protection zones with species and diameter of each by-law protected tree at breast height indicated for trees on the property and within 6m of the site.
 - d. Site plans should also include and identify boundary trees (trees that are shared between adjacent property owners and require the permission of both to injure or remove)
 - e. Site plans should also include the proposed locations of underground services and overhead wires that could conflict with tree growth and planting space.
3. **Expand the monitoring and analysis for tree impacts** resulting from laneway suites, garden suites, multiplex dwellings and other residential building types to include:
 - a. Loss of smaller size private trees (i.e., smaller in diameter than 30 cm as these trees represent the majority of the trees in Toronto (88%) and make up a significant part of the City's current and future urban forest.
 - b. Loss of soft landscaping and plantable space and soil volume
 - c. Loss of trees on adjacent properties
 - d. Loss of major limbs and roots that result in a slow death to the tree.
4. Specify that consultations with relevant stakeholders **include resident associations throughout the city.**

Trees and growing space cannot be an afterthought in the planning process. The urgency of these actions is critical to achieving 40% tree canopy and ensuring all Torontonians, regardless of where they live, have equitable access to trees and the benefits they provide.

Sincerely,



Judy Gibson
Chair, Tree Canopy Preservation and Enhancement Committee
Long Branch Neighbourhood Association

Figure 1: Two “twin” mature, healthy city-owned trees in 2015. Note the growing space and amount of soft landscaping around the tree to the right prior to intensification.



Figure 2: Same two city-owned trees in summer 2023 approx. three years post intensification. Note the lack of growing space and lack of green space/soft landscaping around the tree to the right. Has resulted in a dramatic decline in tree health.

