

26 March 2024

Toronto Preservation Board
Toronto City Hall
100 Queen Street West
Toronto ON M5H 2N2

Dear Chair and Members of the Toronto Preservation Board,

**RE: Toronto Preservation Board Meeting of March 28, 2024
PB16.15 Update on the City's Implementation of Bill 23**

With regards to the City of Toronto's implementation of Bill 23 and changes to the Ontario Heritage Act, will the City maintain a publicly accessible inventory of all listed properties if they are removed from the Heritage Register? Although listed properties will no longer be protected under the Ontario Heritage Act, an inventory would provide an important record of Toronto's heritage as well as the City's formal recognition of properties with cultural heritage value.

In 2005, changes to the Ontario Heritage Act (OHA) provided legal status and protection to listed properties. However municipalities across the province had maintained inventories which included heritage properties that were listed but not designated before 2005. Many of these inventories were initiated by communities and local historical societies even before the passing of the Ontario Heritage Act in 1974-75. As early as June 1973, Toronto City Council recognized the cultural heritage value of properties with "listing" status.

Given the changes to the OHA under Bill 23 with regard to listed heritage properties, it would be appropriate for municipalities to once again maintain an inventory of non-designated properties which have been recognized for their cultural heritage value. This inventory could be independent from the municipality's Heritage Register of properties designated under Part IV or Part V of the Act.

After approximately 50 years of research and recording, municipal inventories of the non-designated heritage properties are an important historical record in their own right which should not be eliminated and lost. They represent a significant legacy of investment of time and resources on the part of hundreds of volunteers as well as dedicated municipal staff across the City and the Province. This legacy should remain accessible to current and future generations.

Will the City of Toronto maintain access to an inventory of non-designated heritage properties through their online Heritage Register Map and Heritage Property Search tool? This online access is a highly valuable and reliable means of facilitating public access to information pertaining to those non-designated properties which have been recognized for their cultural heritage value.

Cultural heritage value exists, and should be recognized, shared and supported, even if it no longer has Provincial legal protection.

Yours truly,

Marybeth McTeague, CAHP
Marilyn Miller, Chair, Junction HCD