

Planning and Housing Committee

City of Toronto
Toronto City Hall
100 Queen Street W
Toronto, ON, M5H 2N2

September 25, 2024

Re: Decision Report – Official Plan Policy Amendments for Infrastructure Projects in Parks and Open Space Areas (PH15.1)

Dear Planning and Housing Committee Members,

The Atmospheric Fund (TAF) is a regional climate agency based in the Greater Toronto and Hamilton Area (GTHA) supporting a net-zero future. We are writing to express our strong support for the proposed Official Plan amendments that would enable easements for alternative energy systems in parks and open space areas without requiring site-specific Official Plan amendments. This will play an important role in facilitating the adoption of clean energy technologies, such as geosystems, and accelerating progress towards the City of Toronto's climate goals.

Geosystems represent the most efficient and low-carbon heating and cooling solution available for most buildings. Accessing the thermal energy underneath parks and open spaces can be done without impacting public enjoyment or damaging natural ecosystems. However, the current requirement for site-specific Official Plan amendments creates an unnecessary barrier to greater investment in geosystems, slowing down the adoption of this proven technology.

While TAF supports the proposed amendment, we believe that the language in the policy could be refined to avoid potential misinterpretation. Specifically, proposed policy 4.3.9 contains two areas that could benefit from greater clarity:

1. The policy limits application to projects deemed "essential," which could require each proponent to demonstrate the "essentiality" of their project. While geosystems contribute significantly to the city's climate goals by reducing energy use and carbon emissions, their classification as "essential" could be open to debate. Since "essential" is typically defined as absolutely necessary, this requirement may create unnecessary obstacles. A more effective approach would be to assess whether projects serve the public interest or provide clear environmental and societal benefits.
2. The policy restricts application to "**public** works and utilities" (emphasis added). If the term "public" is interpreted to apply to both "works" and "utilities," this could inadvertently exclude most geosystems, which are typically owned and operated by building owners or private energy companies, rather than public utilities.

To address these concerns, we suggest the following revision to the proposed wording of policy 4.3.9(b):

b) is an easement necessary to allow for ~~essential~~ **beneficial** underground public works and/or **public**

or private utilities, including alternative energy systems, together with associated access and control points, where there is no reasonable alternative and there is no associated restriction to public access except during construction and maintenance.

We believe this change – or something to this effect - will provide greater clarity and ensure that geoechange systems and other alternative energy solutions are not unnecessarily restricted.

Overall, TAF supports the proposed amendments, as they will facilitate the adoption of clean energy solutions and help Toronto achieve its climate goals. We commend the City's efforts to promote sustainable infrastructure and believe these changes can play a vital role in reducing carbon emissions. Thank you for considering our feedback, and we look forward to the continued advancement of policies supporting a low-carbon future for Toronto.

Sincerely,



Bryan Purcell
VP Policy & Programs, The Atmospheric Fund

About The Atmospheric Fund

The Atmospheric Fund (TAF) is a regional climate agency that invests in low-carbon solutions for the Greater Toronto and Hamilton Area (GTHA) and helps scale them up for broad implementation. We are experienced leaders and collaborate with stakeholders in the private, public, and non-profit sectors who have ideas and opportunities for reducing carbon emissions. Supported by endowment funds, we advance the most promising concepts by investing, providing grants, influencing policies, and running programs. We're particularly interested in ideas that offer benefits in addition to carbon reduction such as improving people's health, creating local jobs, boosting urban resiliency, and contributing to a fair society.