May 8, 2025

Attention: James Nowlan

Executive Director

Environment, Climate and Forestry

Deputation for

PH21.6

Growing Space for Trees: Protecting and Enhancing the Tree Canopy While Supporting Infill Housing and Addressing Concerns with Iceberg Homes - Proposals Report (Ward

All)

Thank you for this opportunity to speak about the preservation of our urban canopy in Toronto.

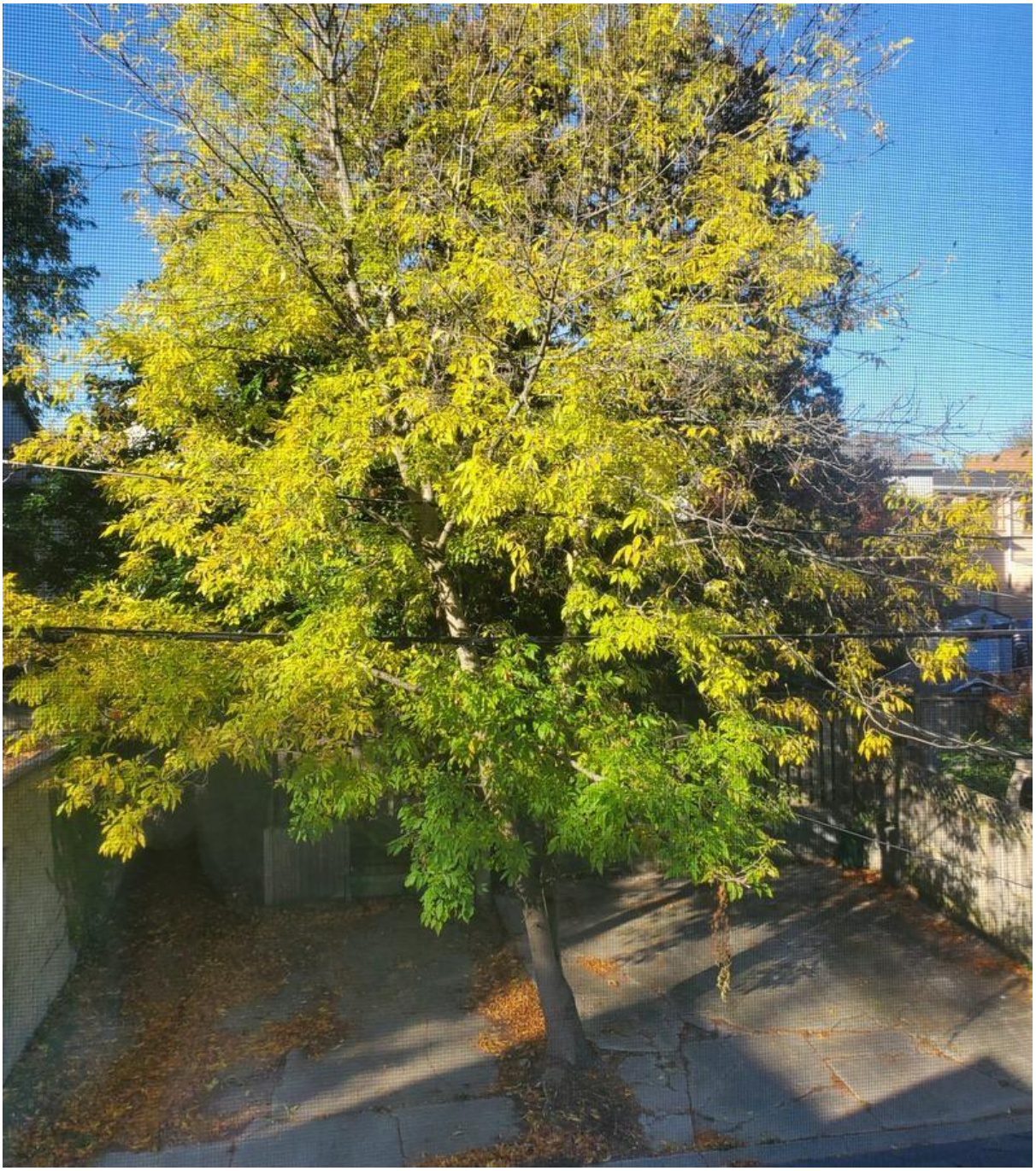
The average tree diameter in Toronto is 16.3 cm. Only 14% of Toronto's trees are greater than 30.6 cm in diameter. Of the total population, 6% are City street trees, 34% are trees in City parks and natural areas and **60% grow on private property**.

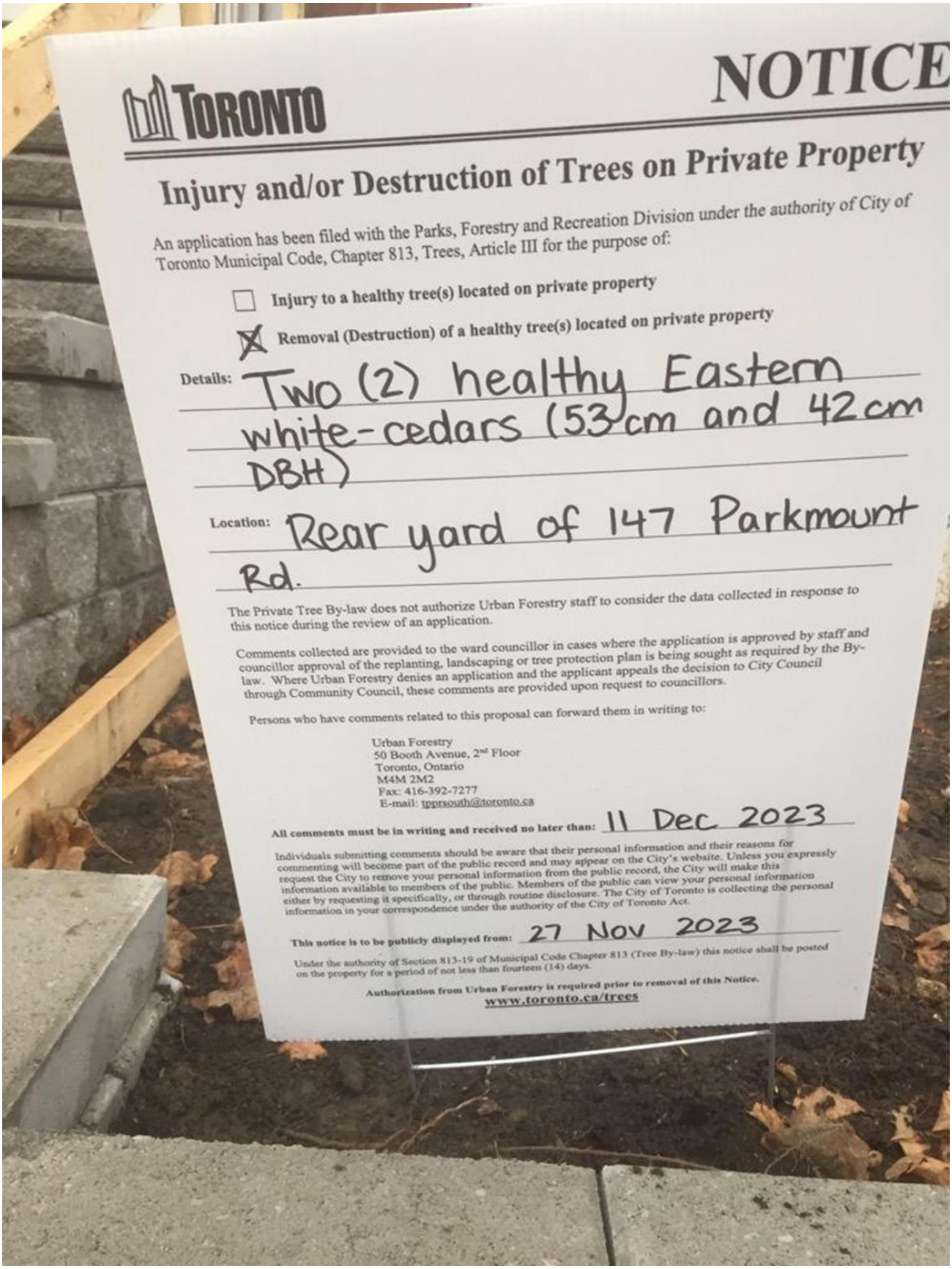
Yet in Toronto, trees located on private property can be cut down, without a permit, if they are under 30 cm. It takes 20 years for a tree to grow to 30 cm.

Trees affect energy consumption by shading buildings, providing evaporative cooling, and blocking winter winds. **Toronto's urban forest is estimated to reduce energy use from heating and cooling** of residential buildings by 41,200 MWH ($9.7million/year).

The street I live on recently lost two beautiful trees.

One of them was under 30 cm, therefore nobody objected to it's removal. It was removed to pre-emptively make way for a garden suite, on a narrow, one way 15 foot wide road, where the creation of garden suites remains a contentious issue.





TORONTO

NOTICE

Injury and/or Destruction of Trees on Private Property

An application has been filed with the Parks, Forestry and Recreation Division under the authority of City of Toronto Municipal Code, Chapter 813, Trees, Article III for the purpose of:

☐ **Injury to a healthy tree(s) located on private property**

☒ **Removal (Destruction) of a healthy tree(s) located on private property**

Details: Two (2) healthy Eastern white-cedars (53cm and 42cm DBH)

Location: Rear yard of 147 Parkmount Rd.

The Private Tree By-law does not authorize Urban Forestry staff to consider the data collected in response to this notice during the review of an application.

Comments collected are provided to the ward councillor in cases where the application is approved by staff and councillor approval of the replanting, landscaping or tree protection plan is being sought as required by the By-law. Where Urban Forestry denies an application and the applicant appeals the decision to City Council through Community Council, these comments are provided upon request to councillors.

Persons who have comments related to this proposal can forward them in writing to:

Urban Forestry
50 Booth Avenue, 2nd Floor
Toronto, Ontario
M4M 2M2
Fax: 416-392-7277
E-mail: tpprsouth@toronto.ca

All comments must be in writing and received no later than: 11 Dec 2023

Individuals submitting comments should be aware that their personal information and their reasons for commenting will become part of the public record and may appear on the City's website. Unless you expressly request the City to remove your personal information from the public record, the City will make this information available to members of the public. Members of the public can view your personal information either by requesting it specifically, or through routine disclosure. The City of Toronto is collecting the personal information in your correspondence under the authority of the City of Toronto Act.

This notice is to be publicly displayed from: 27 Nov 2023

Under the authority of Section 813-19 of Municipal Code Chapter 813 (Tree By-law) this notice shall be posted on the property for a period of not less than fourteen (14) days.

Authorization from Urban Forestry is required prior to removal of this Notice.

www.toronto.ca/trees

Today, the loss of this small piece of urban canopy is an example of how wildlife, heat mitigation, water runoff, pollution mitigation all took second place to the drive to increase property values for a home that was flipped with no consideration for any preservation of the urban canopy. This tree was and will not be replaced.

The parking spot lies in front of a retaining wall, behind which is a beautiful cedar tree with three tines. Two other parts of this cedar tree were cut down, because their diameter was under 30 cm. A request to injure the current cedar tree was denied, because the neighbours on our street happened to see the request to injure this tree, just in the nick of time.

Luckily the City agreed with the residents and the tree was saved. It was only because neighbours were vigilant that the crown of the tree was not cut down.

Later the same year, a beautiful mature pine tree was removed, the diameter being over 30 cm, because apparently the tree was “leaning against a retaining wall”. The retaining wall in question, is the back of a garage, where there are plans to build a garden suite, again, on a contested stretch of road. The gaping void where this beautiful tree was standing is a stark reminder how anyone can do anything and that the tree removal permissions are very lax and loosely enforced.

In a freedom of information request our residents discerned the following:

Since 2011, there have been 130 offences for which a fine of greater than $2,500 per tree was assessed. No fine has reached the maximum of $100,000 per tree.

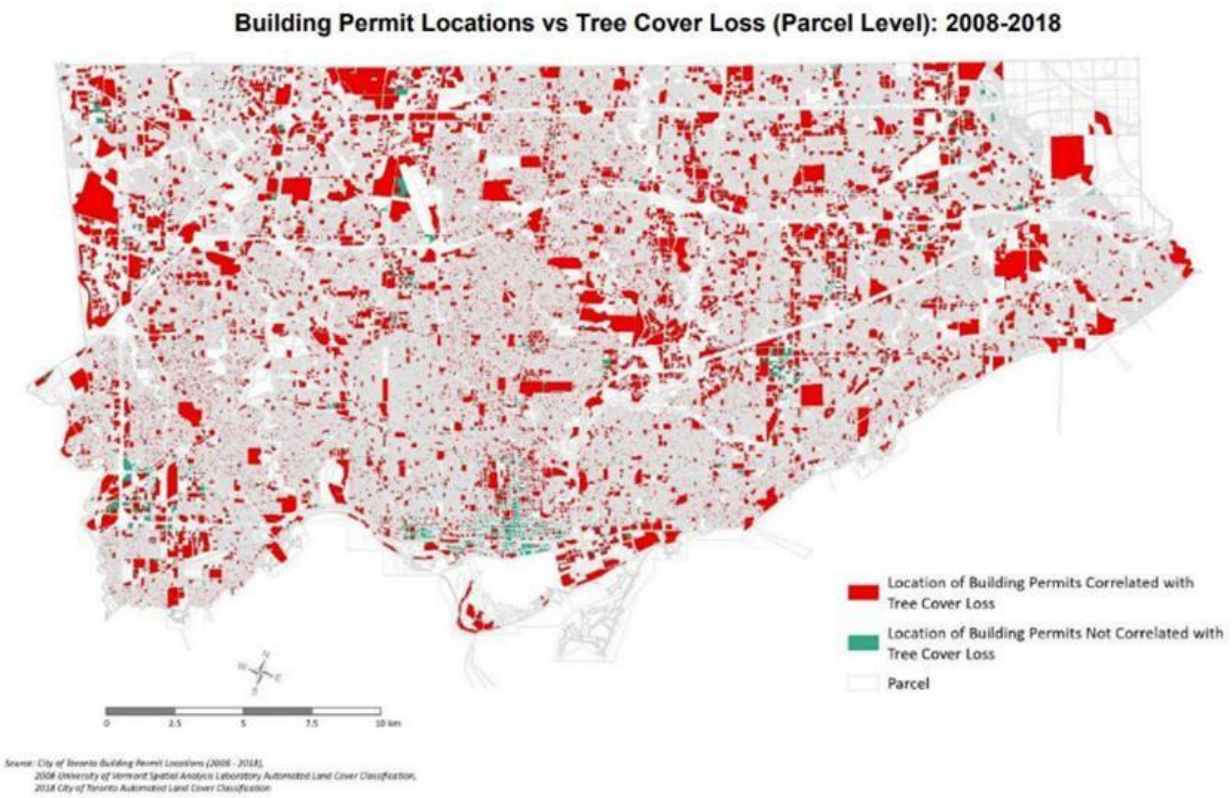
Here is a chart that shows the number of fines that have been imposed for illegal tree cuts since 2011.

- $2,500 to $5,000 = 60

- $5,000 to $10,000 = 41
- $10,000 to $20,000 = 23
- $20,000 to $30,000 = 3
- $30,000 and up? = 3

For a developer, these fines are simply the COST OF DOING BUSINESS.

Figure 1: Building Permit Locations versus Tree Cover Loss (Parcel Level): 2008-2018



The first and most common enforcement action taken by Urban Forestry that involves a financial penalty is

1) the assessment of a Contravention Inspection Fees. These fees amount to $287.03 per tree or $861.16 per tree, depending on the type of contravention.

In the second pathway fines are assessed as a provincial offence. A justice of the peace assesses the fine. The minimum fine is $500 per tree and the maximum is $100,000 per tree. The City prosecutor, with input from Urban Forestry staff, will make a recommendation to the justice of the peace as to an appropriate fine amount. Typical tree assessment criteria such as the size, condition and significance of a tree, and whether a tree was injured or removed are determined. This route is resource-intensive so it is only pursued selectively and strategically. That is why you do not see many fines in the higher price ranges..... and developers simply get away with injuring trees as the “cost of doing business”.

Given that in order to preserve the City’s tree canopy, we first have to know what trees grow where – our

Residents Association commissioned a study of our neighbourhood trees through the University of Toronto Neighbourwoods program. A UofT Masters of Forestry management student, Nemo Zhang spent 2 months measuring and studying the trees along Craven Road and wrote a report on the potential impact of garden suites on the urban canopy in our neighbourhood.

Long Branch and the Annex also used the Neighbourwoods program to map out the trees in their neighbourhood.. May I suggest that the City of Toronto perhaps engage this program on a City wide basis to do some studies of neighbourhoods so mature trees can be preserved and neighbourhood residents can learn about how to preserve and care for their trees?

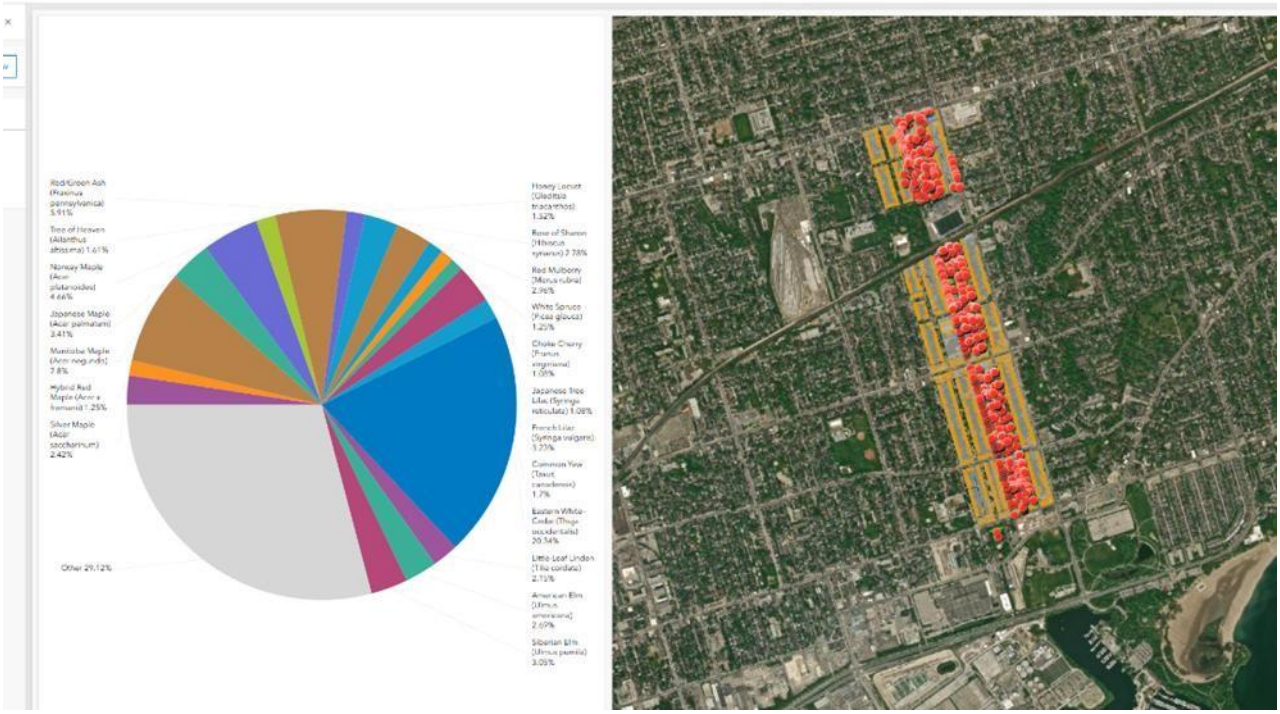
Neighbourwoods© was developed by Dr. W.A. Kenney and Dr. D. Puric-Mladenovic to assist communities and professionals in collecting the tree information they need to strategically plan and manage their urban forest. Since its inception in 1995, Neighbour*woods*© has been used and applied by many communities across Ontario and beyond.

The three components of Neighbourwoods are: a) Tree inventory, monitoring and mapping procedure and training b) tree inventory data analysis c) urban forest stewardship and management planning.

http://neighbourwoods.org/

Summary of the Study: “The Ecological and Monetary Impact of Garden Suites on Urban Forests in a Toronto Neighborhood”

This study analyzes the ecological and economic effects of garden suite developments in Toronto, specifically in the Ashdale Avenue and Parkmount Road neighborhood. The introduction of garden suites aims to alleviate housing shortages but often results in significant urban tree loss. The research involves an inventory of 1,114 trees, geospatial mapping, and ecosystem service assessments. Findings indicate that full development scenarios could lead to a 70.64% reduction in tree canopy cover, equating to a loss of approximately Can$409,960 in ecosystem services. The study emphasizes the need for policies that balance urban development with forest conservation.



Urban densification in Toronto is driven by initiatives such as the garden suites by-law aimed at increasing housing supply. However, such developments often demand the removal of trees, which play essential roles in enhancing livability, environmental quality, and public health. Urban trees contribute significantly to climate resilience, biodiversity, and air quality improvement. The study highlights the need to protect urban forests while pursuing housing developments.

The research concludes that garden suite developments can have severe implications for urban forest canopy, ecosystem services, and economic value. To address these concerns, it calls for integrated urban planning that prioritizes tree preservation and community engagement. Implementing policies that balance housing needs with environmental conservation is crucial for sustainable urban growth.

I hope the City of Toronto and the Team at Environment, Climate and Forestry pay attention to the Neighbourwoods initiative and use it to further achieve the goal to achieve a 40% canopy cover by 2050 in order to align with the City's TransformTO Net Zero Strategy (2021). Updating the City's tree by-laws is important to addressing the complex and interrelated challenges of climate change, urban development and environmental management. The Neighbourwoods project is a ready-made solution to achieve this goal and it is supported by residents all over the province who care about preserving trees, even when they are under 30 cm in diameter.

Attachment

The Ecological and Monetary Impact of Garden Suites on Urban Forests in A Toronto Neighborhood

By Hongyu Zhang, MFC Candidate

Supervisor: Dr. Danijela Puric-Mladenovic, Dr. Rasoul Yousefpour

Submitted by Claudia Aenishanslin

Addendum: Submitted May 11, 2025

Dr. Norman Allan would like to include this correction of his spoken description of the cedar trees that remain in the yard of 147 Parkmount Road.

The photograph of the cedars showing three tines, was the source of a miss perception.
It seemed a second of the cedars had been felled. Had I really not noticed?
I have not noticed things, on occasion. So, I based a presentation on these trees,
on the assumption that a second of the sacred cedars had been sacrificed.
They had not. Only the westernmost tree has been felled.

I have been taught, that there are guardians of the four directions, each with their medicine.
For the Anishinabe, these cedars are one of the four sacred medicines
Their smudge is offered to the bear, in the north.
These cedars had been a perfect ring of seven tines (three trees).

These are a hallowed circle of cedar.

They have been desecrated:
They are still numinous.

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Dr. Norman Bethune Allan. Ph.D., D.C.