

IE27.7 - Ravine Strategy 2026 Implementation Update, City Council March 25, Lenka Holubec, ProtectNatureTO

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RE: IE27.7 - Ravine Strategy 2026 Implementation Update

Dear Mayor Chow and Toronto City Council,

Thank you for this opportunity to comment on 27.7 - Ravine Strategy 2026 Implementation Update.

The following remarks are a follow-up on ProtectNatureTO Feb 25 submission. The intent is a “deep dive” into examining a role of “the Ravine Strategy Draft Update” and “Management Plan for Toronto’s Environmentally Significant Areas” in protection of Toronto’s Environmentally Significant Areas from the long term perspective as mandated by city adopted laws into the OP that must conform to [PPS 2024](#) “4.1 Natural Heritage #1. Natural features and areas shall be protected for the long term”.

Where are the safeguards?

Protect Our Ravines Initiative (PORI) Letter excerpt:

“The Ravine Strategy’s first principle is Protect, but protection from development pressure remains its most consequential gap. We are funding restoration with one hand while allowing irreversible damage with the other.”

It is apparent now to the most of nature stewards, ravine groups and protection advocates that our current efforts to protect natural heritage are not a match to Toronto’s natural heritage biggest challenge – development and growth aspirations. From getting ever closer to the ESAs and the edges of ravines, over the buildings rising taller to accommodate more density, the footprints of city noir is expanding, gobbling up more soil near natural areas, the pressures on watersheds supplying water to protected water features to a growing number of users well beyond what sensitive natural areas carrying capacity can take.

We may not be “paving paradise to put up a parking lot” anymore, nevertheless, paving a hell of a lot to accommodate ever more density and growth, while drastically changing land use in vicinity of the ESAs and ravine systems.

"One of the challenges that we have is that we are experiencing something of a vortex sucking all kinds of growth right into the heart of the city. One of the really important roles for municipal government to play is to ensure that we have clarity as to where growth will go, as well as where growth won't go.

Seventeen per cent of our city is ravines; we've just brought forward additional environmentally-sensitive areas. We don't want growth in those areas. There are also some areas that have heritage designations, and we want to be very careful in terms of how we manage growth in those areas. [Chief City Planner Jennifer Keesmaat on how to fix Toronto, By Riley Sparks in News, Politics, April 21st 2017](#)

Somehow, we made ourselves believe that we can build and grow everywhere in the cities without a meaningful limit and still expect to protect the ESAs, valley lands, forests, ravines to provide for an abundant and diverse wildlife.

We can no longer look the other way when it comes to the fact that we seem to be in the situation as described below:

"Since early 90th, there was a growing awareness in the City of Toronto of having to protect remaining valuable natural areas. Too often in the past, we have considered green space as an afterthought, what was left over after development took its course." [Metropolitan Waterfront Plan, Metropolitan Planning Department, Feb 1994](#)

The question is: can we learn from the past?

Recommendations:

Protection starts with a proper implementation of protection policies in conformity with city of Toronto adopted environmental policies [OPA 262](#), into city OP and the PPS 2024, when a proposal in vicinity of protected natural area arrives.

1. Expand the Management Plan for the ESAs along Ravine Strategy 2026 Implementation Update Report to include "enhanced management approach" to start at "the application submitted stage" by having a proper city division (Environment, Climate & Forestry division) involved with monitoring proposals in vicinity of protected natural heritage to ensure early NHIS done as mandated prior to Notice of Complete Application Issued by the city and have it done well in conformity with relevant policies by the third party ecological consulting company. NHIS is paid by developer but the planners, or Environment, Climate & Forestry division can overview that this is done in conformity with PPS 2024 and Natural Heritage Reference Manual, 2010, the official guide to PPS. This overview demands a good working knowledge of the policies guiding natural heritage in respect to development and it is presently lacking.

Suggested motion:

City Council direct the Chief Planner and Executive Director, City Planning, The Executive Director of Development Review in consultation with the City Solicitor and Environment, Climate & Forestry division to report back to Infrastructure and Environment Committee in the second quarter of 2026 on options to safeguard protection of the ESAs for the long term starting with development application process by making sure the city relevant departments involved in Pre-Application Consultation (PAC) act in a full conformity with City OP and PPS 2024 in respect to the ESAs/ANSI/PSWs, including requesting the NHIS with a complete application when mandated. NHIS must be carried in a full conformity with PPS 2024 to demonstrate no negative impact - direct, indirect and cumulative - resulting from a proposed development on the adjacent natural features and ecological function from a single, multiple or subsequent development.

2. This is to support motion 7. by Councillor Saxe on “options to enhance protection of ravines from ravine-edge real estate development, including an analysis of increasing the buffer between development sites and sensitive ravines”

3. This is also to support the following “Protect Our Ravines Initiative (PORI)” recommendations:

“We propose that within approximately 30 metres of a ravine edge, no application should be allowed to exceed existing zoning permissions”

“Priority setting for new ESA management plans must consider development pressures”

“Confirm an explicit early NHIS milestone for ESA- and ravine-adjacent applications”

4. The argument must be made that the City of Toronto has a legal obligation to protect the ESAs and enforce relevant protection laws, including requesting NHIS with a complete application when mandated and as mandated.

There are presently real concerns with the lack of conformity with adopted and in full force protection laws, discrepancies at the application process level and the role of Development Review agency in respect to the absence of mandated Natural Heritage Impacts Studies (NHIS) with a complete application.

Protection policies are not “red tape”, but critical safeguards of our environment, biodiversity, health and a long term sustainability

Much more needs to be done to bring development process In Toronto to consistency with what was carefully established over decades along the Ontario Planning policies and adopted in the OP in 2015 when city of Toronto adopted milestone [OPA 262](#), bringing environmental policies, designating most of city ESAs and bringing city OP to conformity with then PPS 2014.

If this is not done now, it will be too late to stop degradation and biodiversity loss later on.

Erosion of ravine edges, unsustainable use, non-compatible activities, pets out of control, hydrogeological changes, disturbance, trampling, birds hazards, a loss of wildlife connectivity, more impervious surfaces, spread of invasive species are the consequences of development in vicinity of natural heritage.

“Natural environments have a threshold (or “tipping point”) for disruption beyond which severe and possibly irreversible damage is done to ecological health” [Parks Plan 2013 -2017](#)

Now may be our last chance.

Lenka Holubec on behalf of [ProtectNatureTO](#)

Summary of critical reasons for having Natural Heritage Impact Study done in conformity with city OP and PPS 2024 with Complete Application.

Why is it too late to provide NHIS at the SPA stage or after the Official Plan Amendment/Zoning has taken place.

- **Inability to Demonstrate "No Negative Impact":** Provincial policy requires that development demonstrate no negative impact on natural heritage features and their ecological functions. Waiting until the SPA means the principle of development has already been accepted before the necessary scientific assessment has proven the site can actually support that use without environmental degradation. **Requirement to proof - demonstrate no negative impacts on natural features and ecological function resulting from a proposal is the crux of protection policies mandated in PPS 2024:**

The City OP mandates Study for all proposals in adjacency to protected natural heritage, the ESA, the ANSI and the PSW.

Chapter 3.4 The Natural Environment Policies 3.4.14; 3.4.15 are high level policies adopted into city OP to conform to PPS 2014 under section 3 of the Planning Act. PPS 2024 has not changed these policies.

- **Fixed Development Limits:** By the SPA stage, the "limits of development" (lot lines, building footprints, and road networks) are typically already established through earlier Zoning By-law Amendments or Draft Plans of Subdivision. If an NHIS later reveals a need for larger protective buffers or identifies a significant feature (e.g., habitat for Species at Risk), the project may require a costly and time-consuming redesign or an amendment to already approved zoning.
- **Lost Mitigation Opportunities:** Early-stage studies allow for avoidance—the most effective form of mitigation—by shifting development away from sensitive areas. At the SPA stage, the focus shifts from avoidance to minimization or technical offsetting, which is often less effective and more difficult to implement.
- **Compromised Complete Application Requirements: Toronto Official Plan as many Ontario municipalities include an NHIS as a requirement for a complete application at the Official Plan or Zoning amendment stage.** Providing it later can lead to significant procedural delays and legal risks if the application is challenged at the Ontario Land Tribunal.
- **Design Inefficiencies:** Site Plan Control is intended for technical details like grading, drainage, and landscaping. If basic environmental constraints are not known until this stage, infrastructure (like storm water ponds) may be incorrectly sized or located, leading to conflicting municipal feedback and high re-submission rates.

Additionally to inability to demonstrate no negative impacts, lost mitigation opportunities and compromised complete application requirement, the absence of a Natural Heritage Impact Study (NHIS) or Environmental Impact Study (EIS) at the "complete application" stage in Ontario significantly **hinders public and third-party participation by delaying the review of environmental impacts until later, less transparent stages of the planning process.**

Resulting Impact on Participation and Process transparency is very significant.

1. Reduced Transparency

If an NHIS (or EIS) is not included in the initial submission, the public cannot review, critique, or provide informed feedback on whether the proposed development will result in "no negative impacts" on natural heritage features, as required by the Provincial Policy Statement.

2. Reduced Scope for Influence

The purpose of the NHIS is to inform design by identifying constraints early. Without it, public input may only be possible after the design is finalized, reducing the opportunity to shape the development or protect features.

Key Takeaways:

NHIS (EIS) Necessity: Required for development within or adjacent to natural heritage features (e.g., wetlands, woodlands, habitats) to demonstrate that the proposal will not impair the function of these features.

Pre-determination Risk: If a municipality deems an application complete without an NHIS, it may move forward based on insufficient information, leading to situations where the study is submitted late, limiting the time for public review and creating a risk of approval based on inadequate, pro-forma, or biased data.

Third-Party Review: The lack of this study prevents the public, conservation authorities, and other agencies from evaluating the technical basis of the development's environmental safety. When key environmental reports are missing, the public cannot identify the full scope of risks to wetlands, woodlands, or wildlife habitats, making informed participation in the initial stages impossible. Third-party experts (e.g., environmental consultants hired by ratepayers) cannot adequately analyze the project's impact, weakening their ability to provide expert testimony or raise evidence-based objections, often leaving it too late to influence the design.

Procedural Vulnerability: If a municipality accepts a "complete application" without an NHI (EIS), they risk violating the spirit of the Planning Act and the Provincial Policy Statement, which aim to protect natural heritage