



Item IE27.7: Submission re: Ravine Strategy 2026 Implementation Update

Written Submission to City Council Item 2026.IE27.7 — Ravine Strategy 2026 Implementation Update

Submitted by: Protect Our Ravines Initiative (PORI)

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To the Mayor and Members of City Council,

We are writing on behalf of the Protect Our Ravines Initiative (PORI) and the Friends of the Glen Stewart Ravine. We appeared before the Infrastructure and Environment Committee on February 25th and are grateful for the Committee's thoughtful engagement.

We **endorse** Committee Recommendation #7 as written. Additionally we wish to offer comments on key elements of the motion ([Reinforcing Key Elements of the Motion](#)), and several illustrative proposals for the Q2 report ([The Gap Recommendation #7 Addresses, Four Things We Ask the Q2 Report to Address](#)).

The Strength of Recommendation #7

The stewardship achievements in the Ravine Strategy 2026 staff report deserve Council's support. Recommendation #7 is especially important because it addresses a major gap the report does not: **protection from ravine-edge development pressure**.

It directs the Chief Planner to report back in Q2 2026 on options to strengthen ravine-edge protection, including an expanded ecological buffer analysis. While the implementation report focuses largely on "protection" as stewardship measures such as restoration, invasive species management, and trail investment, Recommendation #7 responds to the separate and growing threat of development pressure at the ravine edge.

Reinforcing Key Elements of the Motion

We recently met with City staff and want to reinforce three important elements of the motion.

1. **Accountability to the Infrastructure and Environment Committee** - The report should remain focused on how the City can better protect ravines from ravine-edge development pressures. Planning tools may form *part* of the solution, but the Infrastructure and Environment Committee's focus on environment protection is crucial to ensure that mandate is enforced. It is premature to shift the matter from its protection mandate and committee context. Planning input is necessary, but this should not become a narrower planning exercise.

2. **The 2026 timeline** - the timeline must reflect the urgency of the gap; ravine-adjacent sites are under active development pressure now. If staff resources are constrained, an interim brief and work plan would be a reasonable minimum.
3. **The explicit buffer analysis** - Effective ravine protection requires a clear distinction between the requirements for public safety (TRCA's 10m setback), and the biological requirements for ecosystem integrity (our proposed 30m ecological buffer).

If staff prefer a phased approach, we suggest an interim Q2 2026 work plan or brief that preserves the motion's protection mandate, includes an explicit buffer analysis and NHIS process review, and outlines the path for any subsequent legal, protection, planning or regulatory work.

The Gap Recommendation #7 Addresses

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. This motion asks that Council act to prevent the next loss, not only celebrate the last repair.

Ravine-adjacent lands are vulnerable to incremental intensification through rezoning and OLT appeals. The policy tools that should hold the line have repeatedly been negotiated away in settlement.

These structural and procedural gaps are exactly what Recommendation #7 begins to address.

Four Things We Ask the Q2 Report to Address

The following proposals are not intended to represent the full scope of the City's review.

(1) Establish an ecological ravine-edge buffer and pair it with a non-settlement policy.

Development immediately adjacent to an ESA, especially at a ravine edge, should not exceed existing zoning permissions. Ravine edges are not building sites; they are the boundary of a protected ecosystem.

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

The 10-metre setback cited by the TRCA (but not always adhered to) is fundamentally a natural hazard mitigation tool providing a safety margin against slope failure, erosion and flooding - essential for urban safety. However, it is insufficient for maintaining the complex ecological functions of an ESA.

The proposed 30-metre ecological buffer is used by London, Ontario and Carolinian Canada, and is rooted in the mitigation of scientifically documented "edge effects". Edge effects occur when the environmental conditions of an adjacent developed area penetrate the natural

feature, altering its microclimate and biological composition. Narrow buffers also allow invasive species to spread and interior forest habitat to degrade, including habitat used by rare species in ESAs across the city.

The Q2 report should examine, with the City Solicitor, what this policy would require to be legally viable and implementable.

(2) Priority setting for new ESA management plans must consider development pressures

The City must identify ESA sites that are facing development pressure now or in the near future and prioritize and accelerate Management Plans for those areas. A site facing an OLT application today cannot wait years for the ecological plan that would strengthen the City's case. The Q2 report should identify how active development pressure will be identified and trigger prioritization of an ESA management plan.

(3) Confirm an explicit early NHIS milestone for ESA- and ravine-adjacent applications

The City's current development application process recognizes that a Natural Heritage Impact Study (NHIS) is required for development near Environmentally Significant Areas (ESAs), and may be required in other natural heritage areas. This is mandated in the Official Plan and the Provincial Policy Statement (PPS 2024). However, in too many cases applicants may proceed past the Pre-Application Consultation, and even as far as the Site Plan Approval (SPA) stage or an approved zoning bylaw amendment before the natural heritage constraints on or adjacent to the site have been fully scoped and verified.

We recommend a review of the process be undertaken to highlight ways to make it transparent, to add a clear stop/go stage where an application does not proceed if the NHIS is not included, and to provide a clear line of responsibility so that when mandated, NHIS's, are requested and reviewed early in the submission process. We propose:

- An explicit early determination for ESA/ravine-adjacent files that would trigger a requirement for an NHIS using the relevant OP and natural heritage mapping;
- where triggered, the NHIS is not just filed, but reviewed to establish ecological constraints before the file submission is deemed complete;
- and the Q2 report must recommend a step-by-step screening, submission, and completeness sequence that turns today's application checklist logic into a real front-end gate for ESA- and ravine-adjacent files.

This "ecological foundation" must come before the full application review, ensuring that site design is dictated by the needs of the ecosystem, rather than the reverse.

(4) Treat strategic land acquisition as an active tool.

We propose that the report identify specific properties adjacent to ESAs and ravines where development pressure is already present, and recommend an acquisition strategy. That strategy should include a prioritized list of at-risk areas, the City divisions that would need to be involved, possible funding tools, and partnership models that would allow community organizations to support implementation. Community groups are ready and willing to work

with the City on these efforts. Once these lands are rezoned and built upon, permanent protection becomes impossible.

The City has done this before, and we would like to see Action Item #10 in the Ravine Strategy put into practice. **The Q2 report should clearly identify what City coordination, policy changes, and community partnership structures are needed to make this approach possible.**

Summary

Recommendation #7 gives Council an opportunity to close a gap in ravine protection. Toronto is investing in restoration and stewardship, but development at the ravine edge weakens those efforts. **We are asking that the motion maintain protection at its core,** and that the Q2 2026 report recommend clear, city-wide protections for lands adjacent to ESAs and ravine edges.

Without limiting the City's review, we urge the Q2 report to address the following priority issues:

1. A minimum 30-metre protection zone at the edge of ESAs and sensitive ravines, along with a policy not to trade away those protections through settlement;
2. Faster prioritization of ESA management plans where development pressure is already active;
3. Earlier Natural Heritage Impact Studies (NHIS), so ecological constraints are confirmed before a development application moves ahead; and
4. A land acquisition strategy, including community partnership options, for ESA-adjacent properties at risk of development.

Together, these measures would help Planning, Legal, and Environment, Climate and Forestry develop coordinated policies and procedures that turn Recommendation #7 into real protection on the ground. The ravine natural heritage system is irreplaceable, and we have to consider ravine protection across departments, before damage occurs. Protection policies are not "red tape", but critical safeguards of our environment, biodiversity, health and a long term sustainability.

An Untapped Opportunity in Restoration

The Ravine Strategy is producing real gains through restoration, stewardship partnerships, and capital investment, and we strongly support the permanent continuation of these efforts.

Proposal 5: Allow Nature Stewards into ESAs for restoration work.

The Toronto Nature Stewards now manage more natural areas than the City's own direct programs and yet stewards are not permitted into the ESA portions of the ravines they know best. Given constrained restoration budgets, we propose that City staff establish a formal

pathway for trained stewards to access ESA areas, with a designated staff contact and defined scope of work to engage in ongoing stewardship activities.

Toronto's ravines are climate infrastructure. Council has an opportunity to ensure the Ravine Strategy's protection principle is as strong as its stewardship, not through restoration after the fact, but through analysis, policy and procedures that prevent the next loss before it happens.

For the kindergarteners who call it their happy place. For the people who found their way back to health on a ravine path. Council has an opportunity this month to make sure there is something left to protect.

We are grateful to Councillor Saxe for Recommendation #7, to Chair Fletcher and the Infrastructure and Environment Committee for their engagement, and to City staff for the genuine progress this report documents. We look forward to the Q2 report and to continuing to work collaboratively with Council and staff on the structural protections Toronto's ravines deserve.

Respectfully submitted,

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