



February 24, 2026

Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2
Attention: Matthew Green

RE: IE27.8 Tree Bylaw Review Report

Dear Councillor Paula Fletcher, Chair, and Members of Infrastructure and Environment Committee,

This report recommends a comprehensive set of Tree Bylaws amendments, operational updates, future studies for further bylaw changes, a new tree size category to strengthen protections for trees, improve compliance and enforcement, support climate resilience and housing objectives, promote equity, and enhance cost recovery and service delivery.

The report includes the following proposals:

- Creation of a "Distinctive Tree" category to better protect healthy, mature trees - which have been decreasing as a proportion of the tree canopy in Toronto
- Report back on implementation of lowering the private tree by-law threshold from 30 cm to 20 cm DBH in order to protect more trees on private property
- Increased financial penalties in enforcement
- Tree preservation incentives, including grants for private tree maintenance
- Official Plan changes that encourage designing around trees
- Implement permit application fees for the Ravine Tree by-law

First, comments related directly to residents' direct experience of Tree Bylaws compliance.

Related to the introduction of the EHON program, in particular, Multiplex and Garden Suite applications, residents have unfortunately become aware of illegal culling of trees, often in close proximity to their homes, which is of great concern. One particularly shocking incident involving a Multiplex application in Leaside led to Councillor Chernos Lin making three Member Motions which were passed by City Council in July 2025, and are included in the Decision History. In regard to one of the three Motions, **Section 1.2 - Tree Bylaw Review Approach** notes that staff have raised with the Province the City's request for the Trees Bylaws to become

“applicable law”, but has received no positive response from Ministry of Municipal Affairs and Housing staff (no surprise there!). *Perhaps the City should raise this with AMO and work with other municipalities to get this fixed?*

Again, residents’ direct experience is that in such cases of reported infractions Urban Forestry staff investigate, but there is little information about the status of the investigation, and any resulting charges and court activity.

The issue of transparency is partially addressed in **2.3 Compliance and Enforcement Enhancements: Enhanced Public Access to Tree Bylaw Contravention Data**” states (page 21) that “in 2026 the initiative is planned to include quarterly publishing through the City’s Open Data portal of reported contraventions under the Tree Bylaws by property address where investigations have been completed”. We support this proposal, however we *recommend further reporting on how the illegal culling issue can be better addressed.*

Other Comments

2.1 Distinctive Tree Category: Strengthening Protections and Incentives for Toronto's Largest Healthy Trees

We understand the concern that the City has a low prevalence of large trees and support the aims of the proposed measure, but we are wondering about the advisability of creating a new category of tree? Will it actually ensure more protection? Will it take resources away from other protection activities, such as enforcement? *We request that these matters be responded to.*

2.2 Lowering the Private Tree Bylaw Size Threshold (Future Study) page.18-19

In 2021, Urban Forestry was directed to assess lowering the protected tree size. The current report is proposing to delay this to 2027 for more study. It appears that the City of Toronto is a laggard in comparison to neighbouring municipalities, and *we request that the City not delay this change, especially in view of the illegal culling issues with Multiplexes and Garden Suites, as noted earlier.*

In summary, we appreciate the comprehensive nature of the report, and while we have a few reservations, support most of the actions and reports.

Yours truly,

Geoff Kettel

Geoff Kettel
Co-Chair

Cc: James Nowlan, Executive Director, Environment, Climate and Forestry
Kim Statham, Director, Urban Forestry, Environment, Climate and Forestry
Nicholas Trevisan, Manager, Tree Protection Strategic Projects; Environment, Climate and Forestry
Jason Thorne, Chief Planner and Executive Director, City Planning

The Federation of North Toronto Residents' Associations (FoNTRA) is a non-profit, volunteer organization comprised of over 30 member organizations. Its members, all residents' associations, include at least 250,000 Toronto residents within their boundaries. The residents' associations that make up FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal.