

## Letter to Steven Dixon, Planning Department, City of Toronto, 9 January 2020

Hello Steven,

It seems that the City departments are working at cross purposes with each other and even within themselves. On one hand, committees of Adjustment and TLAB, under the management of Urban Planning, are accelerating the number of and size of approved FSI variances. The implications of these variances are:

- a) Reduced permeable land area for green space including trees;
- b) Increased impermeable surfaces which increase the storm sewer load;
- c) Larger single family homes that consume more non-renewable resources and generate greenhouse gas emissions.

On the other hand Urban Forestry's Tree Canopy Study IE11.1 Attachment 2, p 71, approved today by the Environment and Infrastructure Committee states:

***“Key finding:*** *The amount of impervious surface in Toronto has increased 1.4 percentage*

*points, from 47.9% to 49.2% between 2009 and 2018. The highest rate of change is in the*

*Utility & Transportation land use (4.8 percentage points increase in hard surface). However,*

*the most area converted from pervious to impervious is found in the Single Family Residential*

*land use, which saw a 349 ha increase in hard surface from 2009-2018.”*

<http://www.toronto.ca/legdocs/mmis/2020/ie/bgrd/backgroundfile-141364.pdf>)

Toronto's Official Plan talks about the importance of the environment and managing stormwater both of which are negatively impacted by the ever decreasing pervious land area.

#### “3.4 THE NATURAL ENVIRONMENT

*Strong communities and a competitive economy need a healthy natural environment. Clean air, soil and water and abundant trees, parks and open spaces, underlie our health and well-being and attract people.....*

*By promoting growth in locations and in forms that support the use of transit, we will reduce energy consumption and air pollution caused by auto use. Through better “green design” **we can save energy and reduce the impacts of stormwater run-off.** Environmental considerations must also be part of our everyday decision making because interaction with the environment is constant. The impacts of growth on the natural environment must be anticipated and assessed if we are to have a healthy environment.*

*We must not only protect the existing urban forest, but also enhance it, especially by planting native trees and trees that increase canopy coverage and diversity. **Protecting Toronto’s natural environment and urban forest should not be compromised by growth, insensitivity to the needs of the environment, or neglect.** P. 3-33*

#### **Ch 3 Policies (I have struggled to keep the order in the OP but Outlook Express prevailed)**

1. *To support strong communities, a competitive economy and a high quality of life, public and private city-building activities and changes to the built environment, including public works, will be environmentally friendly, based on:*
  - b) *protecting, restoring and enhancing the health and integrity of the natural ecosystem, **supporting bio-diversity in the City and targeting ecological improvements, paying particular attention to:***
    - i. ***habitat for native flora** and fauna and aquatic species;*
    - ii. ***water and sediment quality;***
  - c) *addressing **environmental stresses caused by the consumption of natural resources,** by reducing:*
    - ii. *consumption of water and generation of wastewater;*
    - iii. *energy consumption; and*
    - iv. ***reliance on carbon-based fuels for energy;***
  - d) *preserving and enhancing the urban forest by:*
    - i. ***providing suitable growing environments for trees;***

ii. *increasing tree canopy coverage and diversity, especially of long-lived native and large shade trees; and*

iii. *regulating the injury and destruction of trees;*

e) *reducing the risks to life, health, safety, property, and ecosystem health that are associated with flooding, unstable slopes and erosion and contaminated lands; and*

f) *reducing the adverse effects of stormwater and snow melt based on a hierarchy of watershed-based wet weather flow practices which recognize that wet weather flow is most effectively managed where it falls, supplemented by conveyance, then end-of-pipe solutions.*

Would you please tell me if Planning is prepared to adjust the Official Plan, its tribunals and planning regimes to protect permeable surfaces, increase tree cover, reduce greenhouse gas emissions and re-stabilize our residential neighbourhoods. These are very crucial questions at this time of rapid climate change and continental wildfires.

Thanks and best regards,

Harold

Harold B. Smith, B. Arch, MBA, LEED AP

Letter to Steven Dixon, Planning Department, 11 January 2020

Hello Steven,

I endorse Harold Smith's comments and note that in the last 10 years, according to the following excerpt from a Toronto Star article, that we are losing precious permeable space at an alarming rate when climate change is likely to make impacts worse. This is a shocking indictment of monster houses and soldier houses which are energy intensive in construction and generally take much more energy to maintain. This conspicuous consumption is a serious problem when basements are flooded and replacement sewers are not happening fast enough. For some unknown reason all officialdom says these are not matters of

consideration when clearly they are. This protection needs to be in the Urban Design revision of the Official Plan including stronger policies on tree protection and driveways. The Urban Design Update seems to be generally lacking in identifying emerging trends, including climate change, and planning for them, unlike the original 2006 Official Plan.

Toronto's tree canopy has been expanding, but so are the threats it faces

By [Francine Kopun](#) City Hall Bureau, GTA Section, toronto Star  
Sat., Jan. 11, 2020 *timer*3 min. read

From 2008 to 2018 "The amount of impervious land cover - hard surfaces like concrete that repel rainwater - increased by 892 hectares or the equivalent of 1670 football fields over the 10 year period.

**Construction of single family homes accounted for 349 hectares of that."**

Thank you for your consideration and hope to hear from you soon.  
David