



**City of Kingston
Environment, Infrastructure & Transportation Policies Committee
Meeting Number 04-2024
Addendum**

**Tuesday, April 9, 2024 at 6:00 p.m.
Hosted at City Hall in Council Chamber**

5. Delegations

- b)** Joyce Hostyn will be present and speak to the Committee regarding the Little Forests Pilot Program Report.
- c)** Nathan Nездoly will be present and speak to the Committee regarding the Little Forests Pilot Program Report.

11. Correspondence

- a)** Correspondence received from Celeste Booth, dated April 8, 2024, regarding the Little Forests Pilot Program.

Addendum Pages 1 – 3

From: Celeste Booth
To: Stephen, Wendy; Cinanni, Vincent; Amos, Don; Chaves, Paul; Hassan, Jamshed; Tozzo, Brandon
Cc: Sullivan, Iain
Subject: A Call to EITP for Outstanding "Forest Cover" Analyses to meet Official Plan 2.8.2 Policies
Date: April 8, 2024 9:16:37 PM
Attachments: [Forest Cover Report_2010_PLN_A1310-10064.pdf](#)

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Dear members of EITP committee,

I am writing regarding concerns over the recent "tree canopy coverage" reporting and how it relates to Kingston's "forest cover" policies. Our current Official Plan section 2.8.2 states: *Kingston will take steps to achieve the Environment Canada guideline of 30 percent minimum forest coverage in the urban area and maintain the existing forest coverage outside the Urban Boundary, as well as achieve a doubling of the urban forest cover by 2025.*

In order for accountability and accurate tracking of the above policy commitments we must measure "forest cover" (which is quite different from "tree canopy coverage") using definitions consistent with initial reporting and founding principles of the policy, as outlined below.

I hope that after considering the information below, the EITP committee will request staff to model "forest cover" in the urban area using definitions of forest set in the 2006 Central Cataraqui Natural Heritage Study, so that we are comparing "apples to apples". It is important to have up to date "forest cover" modelling in the urban growth boundary to guide important planning decisions. For example, this data is critical when considering development applications in forested areas (such as the upcoming 4085 Bath Road application in Collins Bay Watershed) to ensure that City policies are being upheld.

Kingston's Forest Cover Policy Origin and Changes in Reporting Over Time

The 30% forest cover commitment, initially made in the 2010 Official Plan (OP), was a result of science-based Environment Canada (EC) guidelines, as a minimum threshold for maintaining habitat and watershed health. Any tracking of forest cover since the OP policy was established should have been consistent with the definition used in the Environment Canada guidelines, but unfortunately this has not occurred leading to confusion and lack of accountability.

The purpose of the OP forest cover policy and its basis in EC guidelines has been clearly documented (see attached 2010 City Report PC-10-064).

Since the establishment of OP forest cover policies in 2010 there have been wide inconsistencies in definitions of forest cover and study scope areas (as seen below), making it impossible to track if we are achieving targets.

Below is a timeline for forest cover policy updates and reports, including changes forest cover definition over time, as I understand them:

2004: The Environment Canada "How much habitat is enough?" guidelines, from which our

Official Plan forest cover commitments are based upon, define forest as *"all treed communities (where trees are generally 6 metres or more in height) with a canopy cover of at least 35%, and more typically 60% or greater"*, p 59. Note that this definition does not include individually standing trees.

2006: The Central Cataraqui Natural Heritage Study defined forest as *"all woodlands over 1 hectare with a minimum 60% tree cover"* p 15. Forest cover analysis in the "urban area" was found to be 22% (urban area = area within the urban growth boundary)

2010: Our Official Plan update included section 2.8.2, forest cover commitments to achieve a minimum of 30% forest cover target in the urban area (i.e. within the urban growth boundary), and was rooted in the Environment Canada guidelines, and the 2006 Natural Heritage Study

2011: The Urban Forest Management Plan p 7 states: *"Kingston's urban forest is located on 21 per cent or 9,559 hectares of the City and consists of public trees located in municipal parks, along municipal streets and in the historic Downtown (City of Kingston, 2010)." As per this description it appears to report on only public lands (not the entire urban growth area).*

2015 and 2017: The doubling of the urban forest cover by 2025 policy was included in the 2015 strategic plan and the 2017 Official Plan update. The most current reporting at that time indicated 22% forest cover in the urban area (2006 NHS), so a commitment to doubling forest cover would be equivalent to achieving 44% forest cover in the urban area by 2025 (a commitment we are far from achieving).

2022: City commissioned "forest canopy" update reports 22.48% in the urban area, yet the term "forest" in this report includes individually standing trees which is quite different from NHS and EC definitions that guided our original OP forest cover policies.

2024: Recent EITP report found 20.93% "tree canopy coverage" in the urban area. This analysis also includes individually standing trees, 2m in height or greater, and varies significantly from NHS and EC definitions of forest cover.

Given the changes in recent study parameters and definitions of forest/canopy cover (i.e. including individually standing trees) it is impossible to compare and track "forest cover" targets over time. The inclusion of individually standing trees in recent canopy cover reports is not consistent with the guiding principles of the forest cover policy in the Official Plan.

In order to have accountability in tracking our "forest cover" commitments we need to use a definition of "forest" consistent with the original NHS reporting (including only woodlands over 1 hectare in size with a minimum 60% tree cover). The OP forest cover policies were founded in EC science-based guidelines as a minimum threshold to maintain healthy habitats and watershed health.

In summary, I hope that the EITP will request staff to model "forest cover" in the urban area using definitions of forest set in the 2006 Central Cataraqui Natural Heritage Study, so that we are comparing "apples to apples". These statistics will be important to ensure we meet OP forest cover commitments and to consider when reviewing upcoming development approvals in forested urban areas.

Kingston's forest cover policies pertain to ecologically diverse forest ecosystems which serve much more complex ecological functions than individually standing trees, such as street lined trees. To meet established targets and to preserve watershed health and biodiversity, it is important to evaluate current forest cover in the urban area (which does not include individually standing trees).

Thank you for considering my comments.

With kind regards,
Celeste Booth