

Mr. Jeff Griffiths, Auditor General  
City of Toronto.  
9th floor, Metro Hall, 55 John St.  
Toronto, M5V 3C6

October 22, 2009

Dear Mr. Griffiths,

This letter is prompted by a fairly close reading of the report you presented to the Audit Committee on October 20, addressing a number of the Parks, Forestry and Recreation Capital Projects issues.

Your report described the situation from what you called a “broad high level perspective.” For about ten years, a group of us has studied some of the same issues from a ground-level perspective. I would like to come and talk to you about the view we have from our vantage point.

1. It’s our impression that facility audits conducted by external consultants can be ill-informed, partly because the consultants may have trouble even getting complete access to the facilities they are supposed to evaluate. (We have read this qualifier in their reports and have often seen it ourselves.)

In the case of the City’s outdoor artificial ice rinks and wading pools (two examples), the reports often predict problems that turn out to be fine, and they just as often miss problems that then come up by surprise. We have documented some examples in detail.

2. The citywide State-of-Good-Repair plans that are made on the basis of these audits are therefore also often flawed. In addition, capital projects staff, through no fault of their own, have been in what seems to us be a conflict of interest ever since amalgamation. It’s our understanding that they must meet the major part of their payroll through a percentage of the capital projects that they manage. The incentive to increase the size of their SOGR projects would therefore be compelling. This may be one explanation why the SOGR projects we have studied seem to include so much that is unrelated to repair. Indeed, needed repairs are not always part of the plans. Again, we have detailed examples.

3. Our original reason for learning about the way the city spends its funds in parks was to find out why Torontonians are so often told that there is no money to carry out needed maintenance and repairs, nor to program the best use of existing resources. Over the years, we have had limited success in engaging with the PF&R Division, or the relevant committees of Council, over what we found.

4. At a recent meeting with two of the Division's directors, we made a joint proposal with some part-time staff, for how to improve an under-used (but expensive) outdoor ice rink. We were warned that staff who sought to collaborate with us had put themselves at risk of being investigated by your office for conflict of interest. We are intrigued that your audits might include such details as adding Sunday campfires (one of the many humble things suggested at this meeting) to make an orphan rink more inviting for families. We would like to find out more about this application of the City's conflict of interest policy.

5. At the October 20 audit committee meeting, the question of policies being followed was raised frequently, as it was in your report as well. There has been a remarkable proliferation of policies in the PF&R Division in the last three or four years. At the same time, public consultation regarding policies affecting all of us, has shrunk to the vanishing point. Even our political representatives often seem frustrated and in the dark about the proliferation of new rules and restrictions. Many policies seem to emanate from staff meetings and not be vetted by Council. Is this problem within your scope of work?

Our group recently got a grant from the Ontario Trillium Foundation, to establish a database of the effects of legislation, regulation, policies and guidelines on community use of parks and public space. For that reason, it is of particular interest for us now to come and talk to you about the issues I've raised above. Could you let me know if you could set aside an hour or two in the next month or so, to have a conversation?

Yours truly,

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