



December 5, 2022

Ms. Bonnie Lysyk,  
Auditor General of Ontario,  
20 Dundas Street West, Suite 1530,  
Toronto, Ontario M5G 2C2

Dear Ms. Lysyk,

**Re: Public Request for Compliance and Value for Money Audit with respect to the Therme Spa development proposed for Ontario Place**

We are writing to you on behalf of Ontario Place for All, Waterfront for All and the Architectural Conservancy of Ontario to request a compliance investigation and a value for money audit for the provincial government's redevelopment project at Ontario Place and, specifically, the decision to lease the West Island to Therme Canada.

*Ontario Place for All* is a community-based organization of over 7000 supporters focused on ensuring that Ontario Place remains an outstanding and accessible public resource for the residents of Ontario. Our supporters have been monitoring the Ontario Place development plans since they were announced in January 2019.

*Waterfront for All* is a group of over 20 organizations from across Toronto that strives to ensure that Toronto's waterfront is clean, green, useable, diverse, open, accessible, connected, affordable, and attractive.

*Architectural Conservancy Ontario* is the largest heritage advocacy organization in Ontario with branches in 19 communities across the province. Through education and advocacy, we encourage the conservation and reuse of structures, districts and landscapes of architectural, historic and cultural significance, to inspire and benefit Ontarians.

Ontario Place was opened in 1971 with the intent to showcase and celebrate Ontario and to promote and democratize access to the waterfront. It served as the impetus for a spectacular transformation of Toronto's Waterfront—a process that is still ongoing. In 2014 Ontario Place was designated a Provincial Heritage Property of Provincial

Significance (PHPPS), the highest level of designation for provincially owned properties. See the attached excerpts from the provincial Statement of Cultural Heritage Value for Ontario Place.

The potential redevelopment announced in 2019, which included no requirement to preserve the cultural heritage value of Ontario Place, became the cause of widespread concern. In 2020, Ontario Place was included in the World Monuments Fund Watch list of endangered heritage properties. Also included in the list that year were the Sacred Valley of the Incas and Easter Island.

We are requesting your oversight to assess both compliance with provincial regulation and to bring some transparency to the question of how the destruction of the cultural heritage value on this site is intended to produce value as opposed to losses for Ontarians.

### **Request for Compliance Investigation:**

We believe arrangements with respect to Therme Canada, including but not limited to the treatment of the West Island development on Ontario Place as exempt from an Environmental Assessment, fail to comply with both the Environment Protection Act, and Environmental Assessment Act.

We further believe that the lease that has been granted to Therme Canada fails to comply with the Ontario Heritage Act and provincial Standards and Guidelines for Conservation of Provincial Heritage Properties. In terms of timing, a lease for the entire West Island, with the intent to permit destruction of the heritage landscape, was entered into before preparing an approved Strategic Conservation Plan as required by the regulatory framework. In terms of intention, from its inception, the provincial initiative has flagrantly ignored the province's responsibility to consider and conserve an important and highly valued PHPPS.

### **Request for a Value for Money Audit:**

The financial costs and potential benefits for Ontarians of the proposed redevelopment of Ontario Place are not transparent. The first phase of redevelopment included granting a long-term lease for the entire 22 acres of the Ontario Place West Island, a portion of the mainland, and undisclosed areas of water to an Austrian spa franchise to operate a commercial business. The spa will exclude the public from most or all of the West Island, leaving only a publicly accessible trail around the edge of the spa that appears to be conditional substantial lake filling – another environmental concern.

The province has advised that taxpayers will bear the cost of site servicing and preparation for construction of the spa business. That cost has been estimated by Infrastructure Ontario at \$200 million. In addition, it appears that the lease agreement also requires the province to provide an addition 1000 parking spaces at Ontario Place, which, because of constraints, will likely have to be underground at an estimated cost of

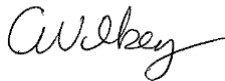
as much as \$100 million. In addition to these direct costs, it would appear that very significant staff resources of Infrastructure Ontario, the Ministries of Infrastructure, Tourism, Culture and Sport, Environment Conservation and Parks, and Citizenship and Multiculturalism have been required to advance approvals and planning for the Therme project.

Aside from these direct costs, the project involves the loss to the public of up to 22 acres of accessible parkland in a location where it cannot be replaced, the clear cutting of hundreds of mature trees, the complete destruction of established wildlife habitat, the levelling of the award-winning Michael Hough landscape design, and the introduction of massive glass structures that will completely overwhelm the scale of the iconic Cinesphere and Pods. All of which will dramatically impair the cultural heritage value of Ontario Place, imposing tangible and irreversible costs on current and future Ontarians.

To date the Province has not had to account to the public for the wholesale destruction of a valuable Provincial Heritage Property or justify the transfer of public property to a private business along with the extraordinary subsidy being provided to assist that business.

We are requesting that you use the authority of your office to shed light on the true costs and benefits to taxpayers of the Ontario Place redevelopment as well to undertake an investigation of the compliance issues connected with the Therme spa project.

Yours truly,



Cynthia Wilkey  
[wilkeycj@gmail.com](mailto:wilkeycj@gmail.com)  
 416 892-8941



Norm Di Pasquale  
[info@ontarioplaceforall.com](mailto:info@ontarioplaceforall.com)  
 (647) 917-3198

Co-Chairs, Ontario Place for All  
[www.ontarioplaceforall.com](http://www.ontarioplaceforall.com)



Ed Hore  
[ejbhore@icloud.com](mailto:ejbhore@icloud.com)  
 416 455-9323

Chair, Waterfront for All  
[www.waterfrontforall.ca](http://www.waterfrontforall.ca)



[president@acontario.ca](mailto:president@acontario.ca)  
 416 367 8075

Chair, Architectural Conservancy of Ontario  
[www.acontario.ca](http://www.acontario.ca)

## **Excerpts from the 2014 Ontario Place Statement of Cultural Heritage Value:**

### **Vision Statement**

Ontario Place, opened in 1971, was conceived by former Premier, the Honorable John Robarts, as a showplace for the province's identity, culture and economic growth. Ontario Place was designed as an inclusive public entertainment, educational and recreational space and programmed to reflect the province's people, culture and geography, as well as a vision for the province's future.

Ontario Place featured innovative new landforms and structures built on Toronto's waterfront, reshaping the relationship between the urban landscape and Lake Ontario. Ontario Place, a cultural heritage landscape, remains a rare and intact Modernist expression of integrated architecture, engineering and landscape that honours and incorporates the natural setting of Lake Ontario. It was a remarkable and ambitious achievement of late twentieth century architecture, and holds an enduring influence in Toronto, the province and internationally.

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### **Design value.**

Ontario Place is a rare surviving example of a designed cultural heritage landscape within the international modernist movement of the late twentieth century. The site created a uniquely integrated environment for entertainment, education and recreation.

The core area of Ontario Place (see map) remains relatively intact and embodies the modernist design vision of interconnected geometries. This is demonstrated in the megastructure forms of both the Cinesphere and pods with their interconnecting walkways, as well as the more modest crystalline modular forms of the three village clusters, designed as gathering places for visitors. These structures are set against an ecological landscape of naturalized landforms, a range of water features, including canals, lagoons and a marina, offering various intimate and compelling views within its designed space.

This particular combination of elements constitutes one of the most important expressions of late twentieth century modernism in the history of the province — the naturalized landforms, on the cutting edge of new ecological design interests; the Cinesphere with its triodetic dome and pioneering IMAX technology; the Pavilion, comprised of five interconnected pods with their tensile structural arrangement; the Forum and the Children's Village play area with their new forms of public engagement (both no longer in existence); and the overall programming designed to change the public perception of Toronto's waterfront.