

28 May, 2020

VIA E-MAIL: councilmeeting@toronto.ca

Re: CC21.20 - ProtectNatureTO submission - City Council consideration May 28, 2020 –Bloor West Bikeway Extension–Shaw St. to Runnymede Rd.

Dear Mayor Tory and Toronto City Councillors,

Thank you for this opportunity to comment on Cycling Network Plan Installations: Bloor West Bikeway Extension & ActiveTO Projects, Shaw St. to Runnymede Rd. segment specifically.

The following communication is regarding Bloor West Bikeway Extension - Shaw St. to Runnymede Rd. segment.

We are supportive of Cycling Network Plan and Bikeway Extensions as this is a part of climate change and COVID 19 oriented actions in the city for people to cycle and also a part of Toronto's Recovery and Rebuild Strategy.

At the same time, regarding Bloor West Bikeway Extension - Shaw St. to Runnymede Rd., there are important considerations in respect to High Park (ANSI/ESA) to mitigate potential negative impacts on ecological function and natural heritage features of this sensitive habitat and home to rich flora & fauna.

As a part of existing *Cycling Impact Analysis* there is no consideration so far dealing with potential impacts of Bloor West Bikeway Extension - Shaw St. to Runnymede Rd. segment - on High Park's ANSI/ESA.

If we look at the map of cycling network: [Toronto – East York](#) - existing cycling network through High Park, it consists of **purple trails** and **green On-Street Cycling Facility**.

Extending bikeway to Runnymede Rd. will increase potentially significantly the number of people biking along Bloor St. and taking some of the trails in High Park to go south, including purple trails.

This will, especially in summertime, increase visitation and use of purple trails as well, which is an additional issue for High Park already suffering from all impacts connected to overuse, non-compliance, trampling, disturbance and habitat fragmentation.

Increased bike traffic generated via Bloor West Bikeway Extension and along High Park may result in significantly higher number of cyclists on the park trails, including purple trails, such as the northern portion of the Grenadier Pond, ANSI/ESA, shoreline and other natural trails that are already off limits but not enforced efficiently (please see the map of cycling trails in Background information).

ASKS:

Prior to implementation of Bloor West Bikeway Extension Shaw St. to Runnymede Rd. segment along High Park, consider including the following mitigation measures:

1. Protect

-Close a portion of shoreline trail as indicated on Marked up Cycling_90f5-TorontoEastYork_2019-2021 Map (see below in Background information)

This portion of trail, between Wendigo Pond and the bridge near public washrooms, was naturalized and provides habitat and connectivity to many species such as turtles, muskrats and waterfowl, especially during nesting. This trail experiences heavy bicycle traffic already causing interference with wildlife.

-Provide a better signage to indicate which trails are off limits for cycling.

2. Educate and promote protection as a responsible way to enjoy the city's unique natural heritage

Bloor West Bikeway Extension project is an opportunity to educate public about High Park's natural heritage and the city's ESAs. It is important to promote low impact use of these sensitive natural areas and respecting of all rules, such as staying on designated trails, keeping dogs on leash and avoiding disturbing wildlife, trampling of sensitive flora, and noise and light disturbances, to allow "safety" for these rare ecosystems.

-Make this education a part of TO action regarding biodiversity crisis and include this campaign and protection related measures into Toronto's Recovery and Rebuild Strategy.

3. Enforce

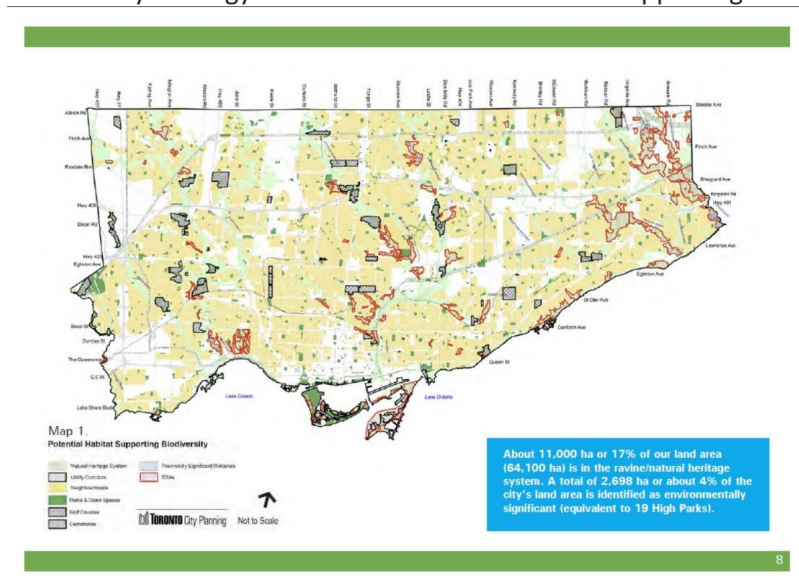
"No bicycling" signs such as the one posted on the Bloor St. entrance into the West Ravine trail as indicated on marked up Cycling_90f5-TorontoEastYork_2019-2021 map (see below).

-Enforce all other rules in High Park helping to protect natural features, fauna & flora.

Discussion:

Big cities have important role to play in the 6th mass extinction to support local and regional biodiversity and ecological systems from decline. In Toronto, the attention in this respect must be paid to ESA/ANSIs - about 4% of city area and ravines (about 17%) - city biodiversity hotspots.

Biodiversity Strategy for Toronto Potential Habitat Supporting Biodiversity Map



The ecological consequences of biodiversity loss due to urbanization, habitat loss and human activities are not just impacting negatively TO protected natural areas but also the overall regional biodiversity. These consequences are just as relevant as those out of town taking place in Ontario. We must fight this biodiversity crisis in the city with the same tenacity as we fight climate change.

Toronto is fortunate to have such rich ecosystems within city boundaries which was the reason why about 40 years ago the process of protecting natural heritage in southern Ontario began culminating in mapping, designating and legislating protection policies framework (City of Toronto By-law No. -2015, OPA 262).

Recent [High Park – Terrestrial Biological Inventory, Prepared by Environmental Monitoring and Data Management, TRCA, November, 2019](#) conclusions are encouraging and very concerning at the same time:

*"The recommendations address the objective of protecting regional biodiversity in the TRCA jurisdiction. **In order to at least maintain, and preferably enhance, the current level of biodiversity at High Park, the overall integrity of the natural heritage system that includes this provincially-significant area must be protected.**"*

"As long as traffic on trails within the Study Area is not too high and restricted to foot traffic only (no bikes), these species are less likely to be impacted. However, heavy visitation to the area increases the threat of predation and/or disturbance by off-leash dogs. Trails with bike traffic or off-leash dogs may result in herpetofauna and small mammal fatalities (Burgin and Hardiman 2012; Weston and Stankowich 2014)." [High Park – Terrestrial Biological Inventory, Prepared by Environmental Monitoring and Data Management, TRCA, November, 2019](#)

People may not be aware that High Park is already suffering very high level of impacts related to overuse, non-compliance and non-compatible activities.

Closure of High Park during Cherry Blossoms for public safety due to COVID 19 manifested that the park is already under too much stress related to our activities but also that public use must be managed by the City under the circumstances to at least *maintain* protection of this rare natural heritage.

COVID 19 crisis highlighted that people need more parks and that most valuable are green areas providing an opportunity for connection with nature and wildlife: ***"Experiencing wildness is particularly important for physical and mental health, according to a new study on urban parks."*** [Wildness in parks can make you feel better - Futurity](#)

"Wildness" and rich biodiversity can only exist and thrive when natural areas protected on paper are managed for protection in reality, which is crucial in urban environments where overuse, habitat loss due to infrastructure, development and human activities can rapidly undermine fauna & flora.

*"As we speak of plans that will chart our way to economic recovery and health through COVID-19, included in these must be funding and policy to safeguard and grow our parks and urban green spaces — for this is where we will instinctively go to heal once this pandemic ends and to stay healthy when the next crisis, personal or global, comes. Let us remember who waited quietly, with leafy, open arms when we had nowhere else to turn. We must not take our access to green space for granted or we risk losing it altogether. **It is essential for our health that we continue to connect with nature, and that we protect and expand the safe, accessible places we have to do so.**"*

<https://theprovince.com/opinion/dr-melissa-lem-and-robin-edger-social-distancing-means-we-need-to-connect-to-nature-more-than-ever-safely>

The City Official Plan supports cycling along climate change initiatives but also enhancing biodiversity and protection of ANSI/ESAs for the long term (please see more in Background information below).

Section 3.4 Natural Environment is amended by adding the four new sidebars entitled: 'Toronto Green Roof Bylaw', 'Bird Friendly', 'Light Pollution' and 'Biodiversity'.

“Biodiversity refers to the rich variety of life forms and the critical roles they play within varied ecosystems. Ecological health is related to healthy biodiversity. The greater the biodiversity of a defined geographic area, the greater the ecological health and resiliency of that area. Policies protecting and enhancing the natural heritage system are a key pillar of biodiversity conservation within Toronto.” City of Toronto By-law No. - 2015, OPA 262

The northern portion of Grenadier Pond shoreline, as depicted in the image below (purple trail in existing cycling network map), is a natural and very sensitive trail.



Natural surface and muddy sections along the north end of Grenadier Pond marshes are critical for wildlife - herpetofauna, small mammals, waterfowl - wood ducks transit when nesting in nearby tree cavities along West Ravine and vital for all other species depending on Grenadier Pond and adjacent ravine.

It is crucial that this trail remains in natural condition (no hard surface, asphalt or gravel) and restricted to pedestrian traffic only for maintaining and enhancing biodiversity and movement of species.

To provide for wildlife species' needs, this trail should remain naturalized and as little disturbed as possible. Pedestrians are the least problem, providing they stay on trail and avoid disturbing wildlife.

Sincerely,

On behalf of [ProtectNatureTO](https://www.protectnatureto.org/)

Submitted by Lenka Holubec

Background:

1.

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2020.CC21.20>

City Council consideration on May 28, 2020

Cycling Network Plan Installations: Bloor West Bikeway Extension & ActiveTO Projects

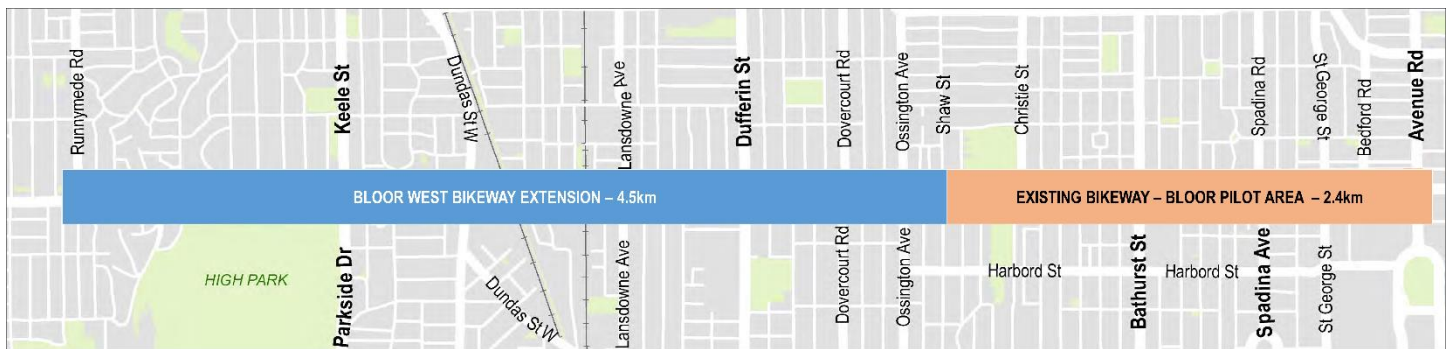
<https://www.toronto.ca/community-people/get-involved/public-consultations/infrastructure-projects/bloor-street-west-bikeway-extension/>

The project area stretches on Bloor Street West from Shaw Street to Runnymede Road. It will connect to the [existing bikeway on Bloor Street West](#), which runs from Avenue Road to Shaw Street.

Cycling Impact Analysis

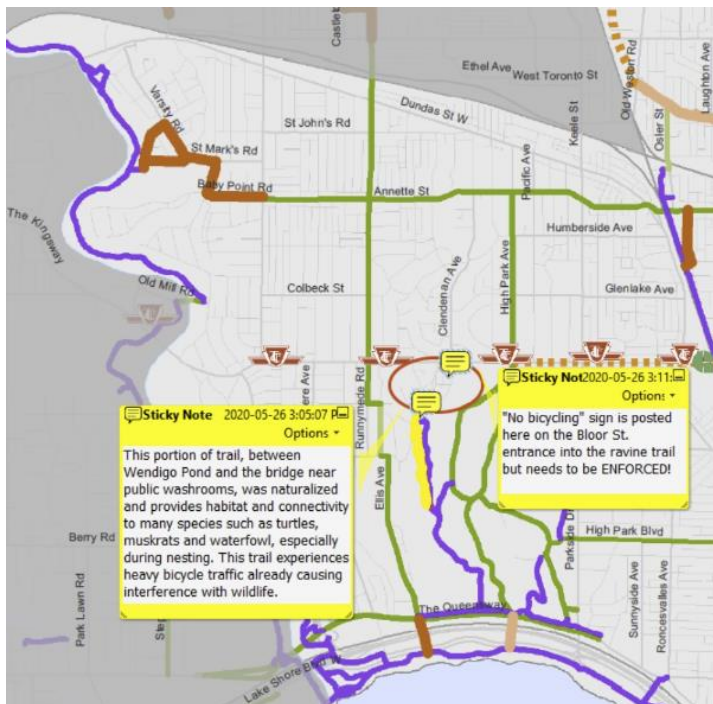
<https://www.toronto.ca/services-payments/streets-parking-transportation/cycling-in-toronto/cycle-track-projects/cycling-network-10-year-plan/>

Project area map showing stretch from Shaw Street to Runnymede Road.



2. Marked up Cycling_90f5-TorontoEastYork_2019-2021 Map

Mark Up indicates portion of trail proposed to be closed to mitigate bicycle traffic and trails in West Ravine off limits already in need of enforced



3.

High Park – Terrestrial Biological Inventory

[https://s3-ca-central-1.amazonaws.com/trcaca/app/uploads/2020/01/10093444/High-Park Terrestrial Inventory Report 2019 Final.pdf](https://s3-ca-central-1.amazonaws.com/trcaca/app/uploads/2020/01/10093444/High-Park_Terrestrial_Inventory_Report_2019_Final.pdf)

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5.2 Site Recommendations

The recommendations address the objective of protecting regional biodiversity in the TRCA jurisdiction. In order to at least maintain, and preferably enhance, the current level of biodiversity at High Park, the overall integrity of the natural heritage system that includes this provincially-significant area must be protected.

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4.5.2.4 Fauna Sensitive to Patch Isolation

All five of the herpetofauna species of concern and five of the seven mammal species of concern score highly for patch isolation sensitivity. Common snapping turtle (Figure 15), midland painted turtle, American toad and eastern gartersnake undergo annual migrations to and from either terrestrial nesting areas with suitable substrate (for both turtles), breeding wetlands (for the toads) or communal hibernacula (for the snakes). **As long as traffic on trails within the Study Area is not too high and restricted to foot traffic only (no bikes), these species are less likely to be impacted. However, heavy visitation to the area increases the threat of predation and/or disturbance by off-leash dogs.** Trails with bike traffic or off-leash dogs may result in herpetofauna and small mammal fatalities (Burgin and Hardiman 2012; Weston and Stankowich 2014).

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5.1 Site Summary

The site has the potential to maintain healthy populations of many flora and fauna Species of Regional and Urban Concern (minus ground- to low-nesting breeding bird species), and overall regional biodiversity. **The extent to which this potential is realized is dependent upon the strategies used to manage public use, protect the integrity of the habitats that exist, and restore degraded or invaded habitats.**

“The main disturbances affecting High Park at present are intensive trampling from park visitors and off-leash dogs in upland habitats, and storm water runoff in the wetlands and riparian areas causing nutrient loading and flash flooding. Other threats include storm damage to forests that are lacking native regeneration, insect outbreaks, and invasive species.”

“A single ground- or low-nesting breeding bird species was recorded in 2018: spotted sandpiper. Common yellowthroat was recorded in 2012 to bring the 10-year total for this nesting guild to 2 species, both on single territories. The abundance of dogs-off leash found outside the fenced in dog park at Dog Hill may be contributing to the lack of ground nesting birds.”

“Intensification and infill development of the neighbourhoods around High Park is anticipated. It is a desirable location. This could exacerbate the user pressures on this already heavily visited park, unless there is careful planning.”

"Uncontrolled recreational activities present a risk to the quality of the habitat in High Park."

"High participation rates increase the negative effects on habitats and species."

Pg. 54 – 56

5.2 Site Recommendations

The recommendations address the objective of protecting regional biodiversity in the TRCA jurisdiction. In order to at least maintain, and preferably enhance, the current level of biodiversity at High Park, the overall integrity of the natural heritage system that includes this provincially-significant area must be protected.

Therefore, at the landscape scale, in keeping with the TNHSS, connections to other natural habitat patches in the landscape need to be enhanced and maintained. Furthermore, the recommendations highlight the issues that occur with increasing public use of the site. Managing public use, strategic placement of interpretive signage, allowing healthy dynamic natural processes to proceed, and controlling invasive species will all aid in addressing the negative matrix influences that are occurring on the park.

1. Protect and Enhance Existing Features

2. Manage Public Use

However, it is important to consider the significance of High Park's waterfront location for dispersal and migration.

Such urban habitats – especially those as extensive as High Park – feed and shelter significant numbers of migrating songbirds in both spring and fall, even though only very few of these birds stay to attempt nesting. At the Study Area, visitor pressure is currently high and is expected to increase. Strategies for managing human-use are needed if ecological health is to be maintained, or enhanced.

"Some areas should be left as refuges for flora and fauna with minimal access, especially Species of Concern; they are generally sensitive to human presence."

"Hikers and dog-walkers are intensive users of the site. The fenced dogs-off leash area on Dog Hill is well constructed and accommodates and manages many dogs, **however many owners walk their dogs off-leash outside this designated area. Leash laws may need be enforced outside designated areas. Where off-leash dog use occurs (regardless of whether it is officially permitted or is not), there is a considerable risk of disturbance to low and ground-nesting birds and herpetofauna such as American toad and gartersnake in upland foraging habitats."**

4.

[Migratory Birds in the City of Toronto, A Literature Review & Data Assessment, FINAL REPORT August 2009 DOUGAN & ASSOCIATES](#)

See pg iii:

"Over the past 17 years the most common migrant bird groups in Toronto have been warblers, shorebirds and sparrows. The most consistent and greatest migratory bird concentrations identified with this data are natural areas on the lakeshore.

The Toronto Islands, Tommy Thompson Park and High Park together account for more than 70% of the TOC's migrant bird records for the period between 1990 and 2007.

Most of the remaining concentration areas are associated with some of the larger natural areas within the City, mainly located along the lakeshore and within the West Don and Humber Creek ravine systems."

5.

City of Toronto By-law No. - 2015, OPA 262 - To adopt Amendment No. 262 to the Official Plan of the City of Toronto with respect to the Environmental Policies and Designation of Environmentally Significant Areas. Amendment of the City Official Plan enacted in May, 2016

<https://www.toronto.ca/legdocs/bills/2015/bill1173.pdf>

Section 3.4 Natural Environment, Policy 13 second and third paragraphs are amended by:

"So that the amended section reads as follows:

"Development or site alteration, with the exception of trails, where appropriate, and conservation, flood and erosion control projects, is not permitted on lands within the natural heritage system that exhibit any of these characteristics.

Activities will be limited to those that are compatible with the preservation of the natural features and ecological functions attributed to the areas. New or expanding infrastructure should be avoided unless there is no reasonable alternative, adverse impacts are minimized and natural features and ecological functions are restored or enhanced where feasible. An impact study, as referred to in Policy 12, will be required for any proposed undertaking in those areas not already the subject of an Environmental Assessment under the Environmental Assessment Act.

Section 3.4 Natural Environment, the sidebar entitled 'The Natural Heritage System and Inventory' is amended by replacing the last two paragraphs with the text below:

"The City has undertaken a program of further study and fieldwork to confirm and identify areas within the natural heritage system that are particularly sensitive and require additional protection to preserve their environmentally significant qualities. These areas are shown on **Map 12A**. Most provincially significant wetlands and areas of natural and scientific interest that have been identified by the Province are shown on **Map 12B**.

Where development is proposed adjacent to these areas, their boundaries will be more precisely determined and any negative impacts will be identified through an impact study as referred to in Policy 12.

Section 3.4 Natural Environment, Policy 14 is deleted and replaced with the following:

"Provincially significant natural heritage features will be protected by:

- a) prohibiting development or site alteration in provincially significant wetlands;
- b) prohibiting development or site alteration in significant portions of the habitat of threatened or endangered species and fish habitat, except in accordance with provincial and federal requirements;
- c) only permitting development or site alteration in the following locations if it has been demonstrated, through a study, that there will be no negative impacts on the natural features or the ecological functions for which the area is identified:
 - i) **lands adjacent** to provincially significant wetlands, or significant portions of the habitat of threatened or endangered species;
 - ii) lands adjacent to fish habitat; and

iii) **in or on lands adjacent** to provincially significant areas of natural and scientific interest, woodlands, valleylands and wildlife habitat; and

d) avoiding new or expanding infrastructure unless there is no reasonable alternative, negative impacts are minimized and natural features and ecological functions are restored or enhanced where feasible.

Section 3.4 Natural Environment is amended by adding the four new sidebars entitled: 'Toronto Green Roof Bylaw', 'Bird Friendly', 'Light Pollution' and 'Biodiversity'

Biodiversity refers to the rich variety of life forms and the critical roles they play within varied ecosystems. Ecological health is related to healthy biodiversity. The greater the biodiversity of a defined geographic area, the greater the ecological health and resiliency of that area. Policies protecting and enhancing the natural heritage system are a key pillar of biodiversity conservation within Toronto.