

## Toronto Urban Fishing Ambassador

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TUFA File: Proposal Toronto Islands Bird Sanctuary  
January 28, 2018

Mayor John Tory and Members of Council

City of Toronto  
100 Queen Street West, 2<sup>nd</sup> Floor  
Toronto, Ontario  
M5H2N2

Dear Mayor and Members of Council:

On behalf of the members of Toronto Urban Fishing Ambassador, Ontario Recreational Fishing Licence Holders and Toronto's recreational paddle sports I am writing to you in regards to City Council Motion MM34.13 "Reinforcing the importance of the Toronto Island Habitat". Motion MM34.13 recommends that City Council request the Ministry of the Environment and Natural Resources to consider the Toronto Islands for designation as a Bird Sanctuary, under the Migratory Birds Act, and the enacting of appropriate regulations for the protection arising from such a designation.

We are strongly opposed to the proposed adoption of Motion MM34.13 for the future restrictions it will place on the responsible recreational and natural use of this public space in our Living City. We understand and expect that "the enacting of appropriate regulations for the protection arising of such a designation" translates to restrictions and prohibitions for recreational activities such as fishing and paddle sports as they have in other City of Toronto Parks where protection statuses such as Environmentally Significant Areas (ESA) and Areas of Natural and Scientific Interest (ANSI) have been declared and then used to ban or restrict such activities.

We thank and appreciate the efforts of Councillor Mike Layton to address our letter of concerns at the Parks and Environment Committee meeting January 18, 2018 addressing Motion PE24.5 .

To recap, Councillor Layton inquired of City Staff of our concerns that restrictions would be made to recreational fishing, paddling sports and other sport activities through the establishment of a Federal Migratory Bird Sanctuary at Toronto Islands. Councillor Layton was given the answer that there would be no further restrictions made to these activities as a result of the establishment and implementation of a Federal Migratory Bird Sanctuary.

Toronto Urban Fishing Ambassadors would like to see this point written into the Motion MM34.13 as an amendment to clarify the intentions and further ramifications of the document.

Our burden of proof that the designation of protective statuses will impact recreational fishing and paddling sports with restrictions and prohibitions is a quote from an official letter written by Richard Ubbens Director, Parks.

October 25, 2016

RE: Family Fishing Day and Fishing at Grenadier Pond

Quote: Richard Ubbens Director, Parks.

“While we have the authority to prohibit fishing, any prohibitions are put in place in consultation with a variety of stakeholders and where we have made the determination that fishing will negatively impact the ecology in that area of the shore. As such, there is a partial ban on fishing at Grenadier Pond due to its designation as both an ANSI and ESA. At this juncture, however, PFR is considering no further restriction of fishing at the Pond beyond the ANSI and ESA areas.”

Toronto Urban Fishing Ambassador has made historical mistakes of being “diplomatically polite” in not previously objecting to the establishment of protective statuses in City of Toronto Parks and the following examples have been the result.

Grenadier Pond, High Park

Paddling sports are banned on Grenadier Pond and High Parks other smaller ponds. Fishing has been banned from the smaller ponds of High Park and limited to a third of Grenadier Pond’s accessible shoreline. At this current point in time there is a continued call from the Natural Environment Committee (NEC), a special interest group, for the outright ban of fishing at Grenadier Pond. (see Attachment B.) Grenadier Pond had been a fishing destination of City of Toronto residents for more than 180 years. The Family Fishing Event at Grenadier Pond has been restricted from 250 children fishing to 65 children fishing as well as another dozen new conditions put onto the event that were demanded in support of the ESA. These restrictions and calls for bans are directly related and supported through the park’s designation of ESA and Ansi as found in the letters of the NEC Natural Environment Committee of High Park. (see Attachment C and D)

Humber Bay Park East

The storm water pond at the park is now off limits to paddle sports. Recreational fishing Family Fishing Events are now subjected to permit restrictions. Friends of Humber Bay Park harass and protest the events and have written requests to the city to ban fishing at the park. (see Attachment E).

We must state for the record that if not for the diplomatic efforts and impartiality of the Waterfront Parks Manager James Dann, Manager of Etobicoke York District Donna Kovachis and Director Parks Richard Ubbens the matters of restrictions and prohibitions would be much worse for both recreational fishing and paddling sports.

Summary

We ask the Mayor and Members of Council to please reject the Motion MM34.13 for a proposed Federal Migratory Bird Sanctuary at Toronto Islands as it conflicts fundamentally with the vision and concept of *Toronto The Living City*. If Council so chooses to adopt Motion MM34.13 will it please consider amending the motion to state that in its adoption that no future restrictions or bans to recreational fishing or paddling sports will be made at Toronto Islands as a result, support or implementation of the Federal Migratory Bird Sanctuary.

We are advocating a co-existence with nature, encouraging all people to be actively engaged and part of *The Living City*, living naturally through swimming, fishing and paddling in our “backyard” at Toronto Islands in Lake Ontario.

Karen Yukich, Leslie Gooding and Lenka Holubec  
High Park Natural Environment Committee  
[mail@highparknature.org](mailto:mail@highparknature.org)

October 25, 2016

**RE: Family Fishing Day and Fishing at Grenadier Pond**

Dear Mses Yukich, Gooding, and Holubec,

Thank you for your letter dated October 7<sup>th</sup>, 2016 regarding fishing at Grenadier Pond. Your passion for the park and the history of the Pond is clearly evident.

As you are aware, fishing is a permitted activity in City of Toronto parkland except where signs are posted indicating fishing is prohibited. We aim to minimize the number of areas where fishing is prohibited and take a "fishing by default" position. The Municipal Code makes it an offence to disobey signs prohibiting fishing or to attempt to harm wildlife. We take both of these offenses seriously, and our Provincial Offences Officers have been authorized to take enforcement action against individuals in both cases.

At a recent stakeholder meeting at City Hall on the issue of urban fishing, there was consensus from both the urban fishing community as well as environmental groups that the best approach to mitigating conflict on our waterways is to promote responsible fishing practices, and educate the public and staff as to their roles and responsibilities. As such, we will continue to work with both local stakeholders and the fishing community to promote responsible urban fishing.

While we have the authority to prohibit fishing, any prohibitions are put in place in consultation with a variety of stakeholders and where we have made the determination that fishing will negatively impact the ecology in that area of the shore. As such, there is a partial ban on fishing at Grenadier Pond due to its designation as both an ANSI and ESA. At this juncture, however, PFR is considering no further restriction of fishing at the Pond beyond the ANSI and ESA areas.

It is by educating a critical mass of responsible anglers that we will change behaviour and normalize responsible fishing behaviours which will in turn address the concerns you have raised in your letter. To help promote responsible fishing, we are working with the Toronto and Region Conservation Authority to design and build "Recreation Nodes" along the waterfront in order to provide more locations where residents can access the water. As the

representative from the TRCA outlined at the meeting, it is critical that the nodes be designed with multiple users in mind, and give the users space to enjoy the different activities which can be accessed at the water's edge. We look forward to watching these spaces evolve as destinations for many types of activities along the waterfront.

We recognize that there have been issues in the past with respect to events running smoothly at popular fishing locations. As such, PFR is committed to improving communications with respect to these events, we are incorporating feedback from both the urban fishing and conservation community into this review. Our goal is to ensure that permitted groups wishing to experience fishing in Toronto's waterways can do so with clear conditions and direction. This review does not include restricting special event permits at Grenadier Pond.

If you have further follow up, or require further information please speak with James Dann, Waterfront Manager for Parks, who is Parks Forestry and Recreation's lead on the urban fishing file.

Regards,



Richard Ubbens  
Director, Parks

Cc: James Dann, Manager, Waterfront Parks, Toronto  
Gord MacPherson, TRCA



October 7, 2016

To: Janie Romoff, General Manager, PFR, City of Toronto

c.c. Donna Kovachis, Councillor Doucette, Green Toronto, Richard Ubbens, James Dann, Helen Sousa, Karintha Battig

**Re: Family Fishing Day and Fishing at Grenadier Pond**

We are writing to request two changes to the City's fishing policies at High Park's Grenadier Pond:

1. That Grenadier Pond no longer be considered an eligible location for the Family Fishing Day event or any other group fishing event.
2. That serious consideration be given to eliminating fishing at Grenadier Pond altogether.

**Rationale**

Grenadier Pond is an important remnant of Toronto's once-extensive lakeshore marshes. The pond is home to special breeding species such as snapping turtle and wood duck and provides a valuable stopover point for migrating waterfowl.

Grenadier Pond is designated in two ways:

- as a provincially significant **Area of Natural and Scientific Interest (ANSI)** which "shall be protected for the long term", and
- as an **Environmentally Significant Area (ESA)** in Toronto's Official Plan which states that: "Activities will be limited to those that are compatible with the preservation of the natural features and ecological functions attributed to the areas."

We question whether fishing can be considered "compatible" at Grenadier Pond given the prevailing conditions, including:

- the scarcity of healthy aquatic habitats in the City
- the inherent risks fishing poses to wildlife, exacerbated by the unsupervised reckless behaviours of some anglers (e.g. discarded/lost fishing gear)
- the heavily vegetated character of Grenadier Pond, both along the shoreline and on and in the water, increasing the risks of snagged and broken lines
- the persistent nature of the hazardous materials generated by fishing, in and near the water
- the absence of any mechanism to monitor and modify the number of anglers and their behavior at any given time
- the need for constant supervision, sufficient enforcement and education to mitigate these risks which neither the City, other levels of government or fishing organizations seem to have the capacity to meet.

- the absence of efforts to revise existing regulations or enact new regulations, particularly in the urban context

Changes were made recently to try to lessen the impacts of fishing (see *Developments to Date* below). Nevertheless, **this recreational activity continues to pose a serious threat to wildlife:**

- Discarded fishing line is a continuing hazard in both fishing approved area and along the no-fishing shoreline. Please, see the attached support material.
- This hazard is made worse by the fact that favoured fishing spots are also attractive to wildlife for shore access, shelter and foraging. Fishing with live bait, corn and other food products and the public feeding of waterfowl also draw waterfowl to the hazardous fishing areas.
- Although initially reduced, fishing continues in the no-fishing area which is also a breeding area for wood ducks and other waterfowl.
- A considerable number of anglers fish in the evening or in off-limits places where they are hard to see.
- When informed of the fishing zone rules, some anglers claim to be unaware of them while others deliberately flout them. Deliberate non-compliance is a growing trend.
- Based on our interactions with the public, only a small proportion of anglers seem to be aware of the high risks posed for the wildlife and environment as a consequence of abandoned fishing line and other items.

Please see the attached **Factsheet** for a survey of **research information** related to the impacts of recreational fishing on wildlife and the environment. In addition, we recommend that you consult with bird/wildlife biologists and other experts not aligned with fishing-promoting organizations to gain more insight into the threats fishing poses to wildlife. Here are some of the relevant findings:

- Fishing gear (e.g., line, lures, hooks, lead weights) deposited along shorelines and water affects both the substrate in which it is deposited as well as wildlife present in the area.
- Lead has a slow dissolution rate and a high stability in sediment, leading to ingestion by waterfowl, which subsequently may suffer the effects of lead poisoning.
- Recreational shoreline angling activity may negatively impact littoral and riparian habitats independent of any direct or indirect influences of fish harvest or fishing mortality through mechanisms such as disturbance (e.g., trampling, erosion) and pollution (e.g., littering).

**Family Fishing Day** is designed to introduce urban youth to recreational fishing. To the extent that it is successful at making youth aware of fishing opportunities at Grenadier Pond, **FFD only serves to add more usage pressure**, both on and after the one-day event, to a fragile natural system that is already overloaded.

High Park is a high-profile, easily accessible location in the midst of an urbanized region of 3+ million people. At any time, anyone can decide to “try fishing” at Grenadier Pond. There is no standard of education, ethics or skill level and no limitation on the number of people who can engage in this activity a relatively small area which is already heavily used for other recreational purposes.

There is a long-standing tradition of fishing at Grenadier Pond, however the city's rapidly growing population presents enormous challenges in respect to the impacts on the natural areas. Other extractive activities such as foraging and hunting were also once common on public lands but are now recognized as no longer appropriate. Boating is also no longer permitted on Grenadier Pond.

There are many other ways to interact with nature that are not harmful. High Park is already well used by thousands of visitors of all ages to observe wildlife and appreciate the natural scenery, conduct nature study and scientific research, participate in interpretive walking tours, pursue photography, etc. Such activities could be further encouraged for urban youth as well as other residents and visitors.

Park users should be able enjoy observing waterfowl and other wildlife in a peaceful setting without finding them surrounded by and even entangled in life-threatening discarded fishing gear.

The availability of fish populations in Grenadier Pond is not a sufficient reason in itself to justify the continuation of fishing. Fishing by humans is not needed to maintain a healthy balance of aquatic life in the pond. If the City wishes to maintain and increase recreational fishing opportunities, there are other locations where this can be done, rather than using a precious resource that has been afforded a high level of protection (ANSI & ESA status).

### **Developments to Date**

In December 2012, the document "Summary of Incidents to Wildlife at Grenadier Pond Related to Fishing: Conclusions and Recommendations" was forwarded to Richard Ubbens and others by Lenka Holubec on behalf of the High Park Natural Environment Committee.

Based on this report and various meetings, the City agreed to limit the fishing zone at Grenadier Pond to the southerly portion and posted various signs - see media release June 22, 2015, Changes to Grenadier Pond Permitted Fishing Area and Improved Wildlife Protection.

The City put the Family Fishing Day on rotation among several sites and it has not been held at Grenadier Pond since 2014. In 2016 it was held at Humber Bay and people there expressed concern about the impact on nesting grebes (see media reports in the Toronto Sun and on CBC TV news).

This year Grenadier Pond experienced a marked escalation of reckless fishing behaviour (fishing at restricted locations, discarded lines and hooks, littering with plastic, etc.) starting with the July 1st weekend, even without the Family Fishing Day event. This is also the week fishing is promoted across Ontario and no license is required. A series of reports submitted to 311 this summer provides detailed documentation of the extent of the misbehavior and the resulting harm to wildlife and unprecedented amount of abandoned fishing line and gear.

It should be noted that many injuries and deaths likely go unseen and/or unreported, and that public concerns related to fishing are also likely under-reported. Actual harm to the wildlife observed at the shoreline is likely only a fraction of the total wildlife affected. The amounts of discarded line and other fishing items are a better indicator of the imminent and long-term harm and damage to wildlife and the affected habitat. Please see attached Images file for photo documentation of fishing impacts.

### **Supervision and Education**

Volunteers concerned about protecting wildlife and their habitat have made great efforts to collect discarded line and hooks. Park Operations staff have also been carrying out some shoreline clean-up. However, it would take constant supervision to try to address wildlife incidents such as ducklings tangled in fishing line. Furthermore, line and hooks caught in vegetation in the water or in overhanging trees can be very difficult or impossible to remove. These hazardous materials can persist in the environment for hundreds of years.

In addition to collecting discarded line, members of our committee and other concerned park users have tried to educate anglers by informing those who are in the no-fishing zone of this fact and showing them a copy of the posted City map that indicates where fishing is permitted. These volunteers may also mention other safety tips found on the signs and City fishing handout. They also check and empty the fishing line receptacles, check the fishing platform and shoreline for other harmful remains from fishing, and report or assist wildlife in distress. This informal volunteer-led attempt to educate anglers is not adequate to deal with the widespread prevalence of illegal and careless behaviour, the absence of angler education and the inadequacy of existing regulations.

Monitoring fishing behaviours to ensure compliance demands a level of attendance by by-law enforcement officers and conservation officers that is simply not available, despite their attempts to provide coverage of this area.

### **Conclusion**

Holding a fishing promotion event at Grenadier Pond only encourages what is already very perilous unsupervised behavior, and would be counter-productive to the protection of this fragile resource. This type of event should no longer be permitted here.

As Toronto's growth puts increasing pressures on our remaining natural areas, it is difficult to justify maintaining and promoting fishing as a recreational activity, given its high risk to wildlife, and especially not within a protected area.

Declaring Grenadier Pond "fishing-free" would make this important wildlife habitat safer, allowing for increased biodiversity and abundance of all species. This would, in turn, enhance the park visitors' experience immensely as the majority of the public visit this area to enjoy the beautiful, peaceful view and to observe wildlife in a natural setting.

Thank you for considering this submission. We would welcome the opportunity to discuss this matter further with you and your staff.

Karen Yukich, Leslie Gooding and Lenka Holubec

High Park Natural Environment Committee

Encl. 1. Factsheet: Impacts of recreational fishing on wildlife and environment

2. Images: Impacts of recreational fishing on wildlife and environment at Grenadier Pond





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April 13, 2017

To: James Dann, District Manager, Parks, PFR, City of Toronto <jdann@toronto.ca>

c.c. "Gord MacPherson" <gmacpherson@trca.on.ca>, "Donna Kovachis" <dkovach@toronto.ca>, Councillor Doucette, "Green Toronto" <greentoronto@toronto.ca>, "Richard Ubbens" <rubbens@toronto.ca>, "Helen Sousa" <hsousa@toronto.ca>, "Karinthia Battig" <kbattig@toronto.ca>

**Re: Family Fishing Day & Fishing at Grenadier Pond**

In our letter to Janie Romoff of October 7, 2016, we called for two changes in the City's policies at High Park's Grenadier Pond: to no longer holding group fishing events at this location, and to consider the elimination of fishing altogether. The response from Richard Ubbens dated October 25, 2016 (forwarded by Katarina Currah on December 20, 2016) states that:

"At this juncture, however, PFR is considering no further restriction of fishing at the Pond beyond the ANSI and ESA areas." and "This review does not include restricting special event permits at Grenadier Pond."

This response has left many concerns unaddressed. It also contains a serious misunderstanding with respect to the status of Grenadier Pond. Therefore we are writing again to request that this matter be fully studied and appropriately addressed.

The following is a list of key points, supported by more detailed references below. We would also urge you to review the contents of our original submission to Janie Romoff.

- a) The entire pond has protected status, both provincially and in the City's Official Plan. PFR has a legal obligation to ensure that the requirements of this protection are met.
- b) Population studies provided by TRCA indicate inadequate numbers of top predator fish, which threatens the health of the entire pond ecosystem.
- c) The pond is important for Wood Duck breeding habitat and as a stopover site for migratory birds, and supports relatively high reptile diversity.
- d) Damage to habitat and threats to wildlife due to fishing have been documented and continue to occur despite the restriction on fishing area and signage.
- e) As reported in The Living City Report Card 2016,<sup>1</sup> "...rapid population growth, continuing urban development and the impacts of a changing climate are placing tremendous pressure on the environmental health of our region..." This pressure highlights the need for prudent

management and greater protection of this scarce resource, a remnant wetland in the City's midst.

- f) There is no indication that any serious research has been conducted by the City or on its behalf by qualified independent experts to determine whether Grenadier Pond can support recreational fishing and to evaluate the long-term cumulative negative impacts on the pond's ecosystem, including top predator fish, waterfowl and reptiles. **Continuing fishing at GP without such a determination seems inconsistent with the policies safeguarding ESA/ANSI designated natural heritage.**
- g) The intent of the second sentence quoted above, regarding "restricting special event permits", is not clear. Does it mean that there has not yet been sufficient review to arrive at this decision? In any case, given the concerns about fish population structure and negative impacts on other wildlife and the City's responsibility to protect this sensitive habitat for the long term, **it would be inappropriate for the City to allow group fishing events that promote more activity at the pond, especially by inexperienced fishers.** While such events may have some educational value and perhaps can be conducted with greater safety at less sensitive sites, this small highly protected pond is not a suitable location for them to occur.

## 1. Protected status

Paragraph 4 of the Oct. 25 letter states: "...PFR is considering no further restriction of fishing at the Pond beyond the ANSI and ESA areas." This implies that some portion of the pond is NOT part of the ANSI or ESA areas, when in fact the entire pond has both types of protected status. Therefore, the City is currently allowing fishing within an area subject to Official Plan and Provincial designations. The Official Plan states that "activities will be limited to those that are compatible with the preservation of the natural features and ecological functions attributed to the areas."

(The area currently marked "no fishing" was selected for this restriction as the area where most of the nesting and the greatest negative impact on waterfowl and other wildlife was observed. The prohibition of fishing in this area in no way implies that fishing is a suitable "compatible" activity at other parts of Grenadier Pond. Negative impacts on waterfowl and other wildlife have been observed and documented along the entire shoreline.)

The report *Environmentally Significant Areas (ESAs) in the City of Toronto, June 2012*<sup>2</sup> prepared for City Planning identifies that Grenadier Pond is important for Wood Duck breeding habitat and is considered a Provincial ANSI because it supports relatively high reptile diversity that is considered provincially or regionally significant (e.g. the snapping turtle). As noted in a City of Toronto staff report dated September 11, 2015<sup>3</sup>, "the alteration or destruction of wetland habitat can have a severe negative impact on Ontario's remaining turtle populations and shoreline disturbance can destroy nesting areas and terrestrial habitat adjacent to water bodies.

Evidence is required to determine whether any particular activity meets the criterion of being "compatible" for this protected habitat.<sup>4</sup>

## **2. Concerns re fish population structure**

At the stakeholders meeting on September 27, 2016 TRCA staff said the most recent monitoring of Grenadier Pond (September 13, 2016) showed a poor fish population structure, with too few piscivorous (predator) fish (i.e. largemouth bass, yellow perch and northern pike), especially of reproductive age.<sup>5</sup> Grenadier Pond is a small, enclosed pond in which fish live their entire lives. There has been concern that fishing pressure was too great to be sustainable since at least 1995 (Proposals for the Rehabilitation of Grenadier Pond, Wendigo Creek and Associated Wetlands, Gartner Lee Limited (June 1995))<sup>6,7</sup>.

## **3. Inconsistent with Fishing Strategy**

One of the objectives of the Fishing Strategy, *Fishing In Your Backyard: An Urban Recreational Fisheries Strategy for the Lake Ontario Northwest Waterfront*<sup>8</sup> is to “identify the state and health of the fish communities and provide guidance for managing recreational fishing.” The Strategy further notes that “Although small numbers of Largemouth Bass, Yellow Perch and Northern Pike are present, the populations of these species are not large enough to sustain angling pressure.”<sup>9</sup> (This comment is made with respect to coastal wetlands, but can apply equally to an enclosed pond.)

## **4. Inconsistent with Parks Plan**

The Parks Plan 2013-2017 observes that “natural environments have a threshold (or “tipping point”) for disruption beyond which severe and possibly irreversible damage is done to ecological health. Knowing where thresholds exist and when they are reached is important for understanding and managing the impacts of use. It allows for the development of early warning systems to identify at-risk locations so that timely action can protect them.” This observation leads to the recommendation that “Parks, Forestry and Recreation will establish criteria to determine appropriate use and set measurable thresholds beyond which protection measures will come into effect.”<sup>10</sup>

## **5. Negative impacts on wildlife and habitat**

Fishing practices have had a significant negative impact on the ecology of the entire pond and shoreline (aquatic habitat, wildlife habitat, long term degradation, by-catch, increasing organic content of water, "baiting") as documented by park users.<sup>11</sup> This is consistent with the results reported in research studies (please see the updated factsheet posted on our website).<sup>12</sup>

The partial restriction of permitted fishing area that came to effect in 2015 is not working. The impacts connected to fishing are negatively affecting the entire pond (abandoned fishing line, lead, etc.). The wildlife (turtles, water birds) use the entire shoreline and are attracted to the fishing permitted area, since most fishers use organic lure and "baiting".

The snapping turtle, listed as a species of special concern both federally and provincially and recently prohibited from hunting in Ontario, has been impacted by fishing at Grenadier Pond as it is a frequent by-catch and a much easier target for poaching during fishing season when many people are already engaged in fishing activities.

## 6. Inadequate enforcement and education

Enforcement and/or education sufficient to change the behaviour of a critical mass of fishers is a very involved, long term process which so far has not even been attempted. There is no new money for this education or enforcement. According to research and practical experience, educating recreational fishing user groups about responsible fishing practices is difficult and results are mixed.

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All of these considerations point to the need for independent scientific studies to determine whether Grenadier Pond can support recreational fishing, and if so, under what conditions and at what level of activity. In general in determining whether to take action to protect the natural heritage, the precautionary principle applies. In the absence of sufficient scientific data indicating that recreational fishing can be conducted without negatively impacting the long-term health of the pond's ecosystem and significant species, **the prudent course is to suspend fishing at Grenadier Pond and to not approve any group fishing events for this location. We call on the City to take this prudent approach.**

Submitted by:

Leslie Gooding 

Lenka Holubec [info@photosharedvisions.com](mailto:info@photosharedvisions.com)

Karen Yukich [karen@kryukich.on.ca](mailto:karen@kryukich.on.ca)

On behalf of the High Park Natural Environment Committee [mail@highparknature.org](mailto:mail@highparknature.org)

(Footnotes are attached)

## Footnotes

1. *The Living City Report Card 2016*, TRCA, <https://trca.ca/wp-content/uploads/2017/02/3058-LCRC-2016-Final-WEB.pdf> page 3.
2. Environmentally Significant Areas (ESAs) in the City of Toronto, June 2012  
[https://www1.toronto.ca/City%20of%20Toronto/City%20Planning/Zoning%20&%20Environment/Files/pdf/ESA/esa\\_report\\_volume1\\_sept2012.pdf](https://www1.toronto.ca/City%20of%20Toronto/City%20Planning/Zoning%20&%20Environment/Files/pdf/ESA/esa_report_volume1_sept2012.pdf)
3. [www.toronto.ca/legdocs/mmis/2015/pe/bgrd/backgroundfile-83344.pdf](http://www.toronto.ca/legdocs/mmis/2015/pe/bgrd/backgroundfile-83344.pdf) page 8
4. Grenadier Pond in its entirety is designated part of the High Park Oak Woodlands Provincial Life Science ANIS (Area of Natural and Scientific Interest) and as such “shall be protected for the long term.” (Section 2.1 of the Provincial Policy Statement 2014, where “shall” indicates a positive direction, as opposed to “should,” “promote,” or “encourage,” which allow Council discretion). City Council has accepted this direction in including Grenadier Pond in its entirety in the ESA (Environmentally Significant Area) designation for High Park. As such, “Activities will be limited to those that are compatible with the preservation of the natural features and ecological functions attributed to the areas.” (Official Plan, Policy 3.4.13). It is a matter of fact (ie evidence is required) whether any particular activity meets this criterion.
5. Detailed population data is available from the TRCA.
6. Proposals for the Rehabilitation of Grenadier Pond, Wendigo Creek and Associated Wetlands, Gartner Lee Limited (June 1995), <http://www.highparknature.org/wiki/wiki.php?n=RestoreAndResearch.PolicyDocuments>, or copy in the High Park branch of the Toronto Public Library.
7. Fish Population Structure: Aquatic ecosystems are complex. Simply put, plant species provide energy through photosynthesis and plants are eaten by herbivores which in turn are eaten by predators. If there are too few predators to keep the population of herbivores in check, the entire ecosystem, including the plants, suffers. (The classic example is plants-deer-wolves. If there are too few wolves, the deer overgraze the plants, leading to loss of forest regeneration.) In Grenadier Pond, the top predators are mature largemouth bass, yellow perch, and pike. They prey on sunfish, which in turn prey on microscopic zooplankton, which consume phytoplankton. With too few predators, the sunfish overgraze the zooplankton, leading to excessive phytoplankton for ecosystem health. In addition, sunfish prey on bass nests, reducing reproductive success. (Gartner Lee, op. cit., pages 51 and 56). Pike and bass in particular are targeted by anglers. In the absence of fishing pressure, Grenadier Pond may be a self-sustaining ecosystem.
8. *Fishing In Your Backyard: An Urban Recreational Fisheries Strategy for the Lake Ontario Northwest Waterfront*  
[http://aquatichabitat.ca/wp/wp-content/uploads/2016/06/URFS\\_June-20-2016.pdf](http://aquatichabitat.ca/wp/wp-content/uploads/2016/06/URFS_June-20-2016.pdf), page 5
9. Ibid, page 7
10. Parks Plan, pages 37 and 38
11. Images: Impacts of recreational fishing on wildlife and environment at Grenadier Pond  
[http://www.highparknature.org/wiki/uploads/VolunteerOpportunities/Factsheet\\_Impacts%20of%20recreational%20fishing%20on%20wildlife%20and%20environment\\_oct7\\_16.pdf](http://www.highparknature.org/wiki/uploads/VolunteerOpportunities/Factsheet_Impacts%20of%20recreational%20fishing%20on%20wildlife%20and%20environment_oct7_16.pdf)
12. Factsheet: Impacts of recreational fishing on wildlife and environment  
[http://www.highparknature.org/wiki/uploads/VolunteerOpportunities/Factsheet\\_Impacts\\_of\\_recreational\\_fishing\\_on\\_wildlife\\_and\\_environment\\_update\\_Apr12\\_17.pdf](http://www.highparknature.org/wiki/uploads/VolunteerOpportunities/Factsheet_Impacts_of_recreational_fishing_on_wildlife_and_environment_update_Apr12_17.pdf)

Emails re Fishing and FFD 2017

Date: Wed, 17 May 2017 14:09:55 -0400

To: "James Dann" <James.Dann@toronto.ca>

From: "Karen Yukich"

Subject: RE: Family Fishing Day & Fishing at Grenadier Pond

Cc: "Gord MacPherson" <gmacpherson@trca.on.ca>,  
"Donna Kovachis" <Donna.Kovachis@toronto.ca>,  
"Councillor Doucette" <Councillor\_Doucette@toronto.ca>,  
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"Richard Ubbens" <Richard.Ubbens@toronto.ca>,  
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"Karinthia Battig" <Karinthia.Battig@toronto.ca>,  
"High Park Natural Environment Committee" <mail@highparknature.org>,  
"Megan Price" <Megan.Price@toronto.ca>

Hi James,

We are writing to follow up on our letter of April 13, 2017.

As mentioned in our letter, one major consideration is the protection of the snapping turtle population in Grenadier Pond. The Snapping Turtle is listed as a species of special concern both federally (under the Species at Risk Act) and provincially (under the Ontario Endangered Species Act). Snapping Turtles face many threats including habitat loss, road mortality and persecution from people.

The ingestion of fish hooks is increasingly viewed as serious threat to this species, particularly in areas with intensive recreational fishing, because of fishing line abandonment. A recent study found "that currently observed rates of fish hook ingestion by freshwater turtles are likely sufficient to cause population declines" ([Steen and Robinson 2017](#)).

We have consulted David Seburn, Chair of the Conservation Committee of the Canadian Herpetological Society, who drew our attention to above-noted study. He also offered the suggestion that either the fishing season at Grenadier Pond be limited or barbless hooks be mandated. However, based on our experience at Grenadier Pond, fine-tuning the fishing rules would have negligible impact since adequate resources for effective education and enforcement are simply not available.

The importance of preserving Toronto's biodiversity was highlighted at the recent Chief Planner Roundtable on Biodiverse TO, with comments from Richard Ubbens and other experts about the need to reverse the downward trend toward degradation and species loss, to design for biodiversity rather than based on user interests, to develop thresholds of use and criteria and measures to protect against excessive use, and to recognize that recreational activities have impacts and conservation should prevail in biodiversity hotspots (ESAs, ANSIs).

Turtle, fish and waterfowl populations, as well as other species, are all being adversely affected by fishing at Grenadier Pond, and these impacts will only get worse unless significant steps are taken to shift the focus from high-impact recreational use to conservation and protection.

We therefore reiterate our call for the City to take a prudent approach and suspend fishing at Grenadier Pond and to not approve any group fishing events at this location.

We look forward to hearing from you soon.

Karen Yukich, Leslie Gooding and Lenka Holubec  
on behalf of the High Park Natural Environment Committee

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At 03:01 PM 4/20/2017, James Dann wrote:

Thanks for your email/letter Karen. We are currently reviewing and will be getting back to you by the end of next week with a reply.

Thanks again for your on-going interest in High Park

James Dann  
Waterfront Parks Manager  
416-392-1122

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**From:** Karen Yukich  
**Sent:** April-14-17 10:13 AM  
**To:** James Dann <James.Dann@toronto.ca>  
**Cc:** "Gord MacPherson" <gmacpherson@trca.on.ca>; Donna Kovachis <Donna.Kovachis@toronto.ca>; Councillor Doucette <Councillor\_Doucette@toronto.ca>; Green Toronto <greentoronto@toronto.ca>; Richard Ubbens <Richard.Ubbens@toronto.ca>; Helen Sousa <Helen.Sousa@toronto.ca>; Karinthia Battig <Karinthia.Battig@toronto.ca>; High Park Natural Environment Committee <mail@highparknature.org>;  
**Subject:** Family Fishing Day & Fishing at Grenadier Pond

Hi James,

Attached is a letter that follows up on the letter on the same subject from Richard Ubbens dated October 25, 2016 (forwarded by Katarina Currah on December 20, 2016) in response to our previous letter to Janie Romoff of October 7, 2016 (both of which are posted [on our website](#) along with an updated factsheet). We believe that the October 25 response has left many concerns unaddressed. It also contains a serious misunderstanding with respect to the status of Grenadier Pond. Therefore we are writing again to request that this matter be fully studied and appropriately addressed.

Thank you for giving this matter full consideration. Please let us know if you have any questions or require further information.

Karen Yukich, Leslie Gooding and Lenka Holubec  
on behalf of the High Park Natural Environment Committee

# ONTARIO FEDERATION OF ANGLERS & HUNTERS



*Ontario Conservation Centre*

P.O. Box 2800, 4601 Guthrie Drive, Peterborough, Ontario K9J 8L5  
Phone: (705) 748.6324 • Fax: (705) 748.9577 • Visit: [www.ofah.org](http://www.ofah.org) • Email: [ofah@ofah.org](mailto:ofah@ofah.org)

OFAH FILE: 427  
June 29, 2016

Mayor John Tory and Members of Council  
City of Toronto  
100 Queen Street West, 2<sup>nd</sup> Floor  
Toronto, Ontario  
M5H 2N2

Dear Mayor and Members of Council:

On behalf of the Ontario Federation of Anglers and Hunters, and anglers throughout the province, I am writing to you in regards to the Family Fishing Week Event being hosted at the Humber Bay Park East this Saturday (July 2) from 10:00 a.m. to 1:00 p.m. We have received a phone call from an individual with the Friends of Humber Bay Park threatening to again disrupt the event, as they did in 2015. We have also since read social media posts where they have attempted to recruit members to write letters asking for the event to be cancelled, or failing that, to recruit them to the protest.

As the event has been duly permitted by the City of Toronto and the Ministry of Natural Resources and Forestry (MNRF), and Toronto Police Services found no violations by anglers at last year's event, we would like to know what you will do to protect this event from unnecessary and inappropriate disruption.

We presume permitted events by other groups, from family picnics to religious events to youth sports to pride events, would be allowed to occur free of such discriminatory harassment as is being threatened by this anti-fishing group whose past and present claims have never been validated.

Neither the Toronto Region Conservation Authority (TRCA) nor the MNRF have concerns with fishing at this site, and the event is well organized. As you may be aware, harassing legal angling activities is a violation of Section 13 (1) of the provincial Fish and Wildlife Conservation Act.

These individuals also took photos of children without parental consent and have stated on social media they will again be taking photographs of the event.

I have attached the letter we sent to the city last year that includes details on the disruption caused by the Friends of Humber Bay Park, to which we have yet to receive a response. It is as a result of that lack of response that these events continue to face uninformed harassment, and we intend to send a follow up letter requesting a meeting with Mayor Tory in the near future.

We have also alerted MNRF Enforcement and Toronto Police Services to the probability of harassment of anglers at this event.



ONTARIO FEDERATION OF ANGLERS AND HUNTERS

Mayor John Tory  
June 29, 2016  
Page Two

We trust that as a Member of Toronto City Council, you do not support harassment of residents engaged in a legal permitted event, and that you will do whatever possible to ensure that this behaviour is not condoned.

Yours in Conservation,

A handwritten signature in dark ink, appearing to read "Greg Farrant". The signature is fluid and cursive, with the first name "Greg" being more prominent than the last name "Farrant".

Greg Farrant  
Manager, Government Affairs & Policy

GF/gh  
Attach.

cc: Jorge Ture, Park Supervisor, City of Toronto  
Ryan Teixeira, Park Bylaw Enforcement Officer, City of Toronto  
OFAH Board of Directors  
Angelo Lombardo, OFAH Executive Director  
Matt DeMille, OFAH Manager, Fish & Wildlife Services  
David Ryrie, OFAH Youth Education Manager