

EX34.5.3

Mayor Tory and Executive Board Members,

Re: May 14 Agenda Scarborough Waterfront Project

1. Our mandate, as should be with the TRCA, is to preserve Toronto's last priceless natural shoreline. The 700 m. shoreline of most concern now under threat is in the eastern sector of the SWP. In its natural state, the 12,000 year old shoreline is a tremendous asset for education, recreation, heritage, and is an established habitat to hundreds of local and migrating species. The value of this area will be devastated and irrevocably impaired if the "preferred option" to "hardscape" the shoreline is realized. A hardened waterfront is composed of rocks, rubble and armourstone that renders the priceless Lake Ontario waterfront both hazardous and useless for the public and boaters to access the water.
2. We agree with a SWP vision as it offers a golden opportunity to provide a fully considered development plan to enjoy all the opportunities that this fresh water lake has to offer i.e. access to the water for the enjoyment of recreational activities, for surfers, swimmers, hikers, boaters, picnicking and all sandy beach uses. Unfortunately, the "preferred option" plan fails on all the potential opportunities as mentioned.
3. To achieve a fully considered waterfront plan, please review and compare the attached two options for your consideration, TRCA's option (Plan 1) and our alternate option (Plan 2).

Plan 1 – proposed by TRCA is the corporate's "preferred option". Please note that the attached concept plan reflects the "preferred option" as presented at the PIC2 meeting. The updated "preferred option" is detailed in the E.A. report showing an eastern access path via a corkscrew construction at the Grey Abbey Park ravine. The updated proposed bike trail from Grey Abbey Park ravine to Beachgrove will require a paved 4 m. wide service road along the crest of the cliff. This environmentally unfriendly plan will destroy a significant area of the forest floor including sensitive meadows of fauna and flora through to and including the East Point bird sanctuary.

Our alternate Plan 2 proposes the use of Copperfield Road. A sparsely used service road running parallel to and just several meters from the crest of the cliff directly connecting to the waterfront trail at Beachgrove. This unofficial waterfront trail bike route is currently used by many cyclists and would not require an additional paved service road/bike trail.

Plan 2 proposed by “Friends of the Bluffs” is the result of research, input from community leaders, input from the public’s sentiments expressed at the PIC 1 and PIC 2 meetings and complies with the Royal Commission Report, the Toronto Waterfront Report and the TRCA’s environmental recommendations report (Scarborough Shoreline-Terrestrial Biological Inventory and Assessment February 2012) not to harden this specific shoreline.

Our concept plan includes a headland beach development at the Guild Park waterfront that would provide safe public access to the water.

The headland will also provide a safe docking facility for boats of any type to visit this destination park. This water access facility would complement the new Guild Inn restaurant development and Guild Park gardens for visiting boaters to enjoy.

Our Plan 2 concept option has been presented to TRCA’s coastal engineer who confirmed that a reclaimed sandy beach along the harden shoreline is feasible and our headland concept would not negatively affect the Blue Flag sandy beach east at Bluffers Park.

Our alternate plan to develop a recreationally useful water park facility was presented to Councillor Glenn De Baeremaeker. He supported the idea and proposed a motion to the TRCA Board to both save 650 meters of the Grey Abbey beach and also approved the headland concept for a reclaimed sandy beach along the hardened shoreline.

4. TRCA’s SWP team has been generously blessed with a budget over \$2,000,000 to produce an impressive corporate plan to secure Executive Committee funding for a self-initiated 12 year works program.

The draft E.A. pronounces that the hardened waterfront will be a benefit to the natural environment “to enhance terrestrial and aquatic habitats”. This could not be further from the truth. No environmental report would ever suggest that replacing a natural healthy ecosystem with urbanized artificial structures would be preferable.

TRCA’s long term agenda of developing a hardened waterfront roadway was previously justified as an erosion control project. TRCA’s determination to continue with the roadway east can no long be justified based on erosion control arguments.

5. The E.A. draft does not mention the overwhelming public's disapproval to destroy a natural sandy beach. This sentiment was clearly expressed at PIC 1, PIC2, PIC 3 meetings and also the stakeholder meeting that we attended. None of the PIC meetings were recorded; therefore, the legal process to hold PIC meetings was accomplished regardless of the overwhelming public disapproval to the "preferred option".

Jane Fairburn, the critically acclaimed author of "Along the Shore –discovering Toronto's waterfront heritage", whose passion and expert in depth knowledge of this coastline, disputes the whole shoreline hardening concept. She questioned the expertise of TRCA's paid consultant who is a leading spokesperson for the SWP team who admitted that she has never been along the historical shoreline but is promoting to destroy in favour of a waterfront roadway extension.

Complaint Arguments

- a) Destruction of an historic and significant shoreline:
Sandy beach natural coastlines anywhere in the world are acknowledged as valued assets to be protected as precious commodities. Only under extreme necessity or vital commercial interests would a beach be considered for development. The Bluffs are not only historic and significant; they have value in their intrinsic purpose and archeological aspects. They do not require to be altered for the stated SWP objectives; alternative options can achieve an environmentally friendly and publically useful SWP plan. Friends of the Bluffs contend that TRCA's self serving premise or notion of a continuous waterfront trail can be achieved only in areas that make environmental and economic sense. For example, the connecting waterfront trail from Beechgrove to Frenchman's Bay is a sensible compromise of waterfront and public roadways. It makes no sense for the SWP to destroy a priceless waterfront feature such as a sandy beach, the most desirable attraction of any waterfront anywhere in the world. It is unreasonable to eliminate the Grey Abbey Park beachfront when better alternate SWP options are available.
- b) Public Breach of Trust by misrepresentation of the "conservation" mandate.
The TRCA has deceptively initiated their SWP road building venture to the public in the guise of park development and enhanced green spaces.
A "Conservation Authority" formed by Provincial Legislation is the governing authority empowered for the enforcement of environmental protection. The TRCA corporation is the regional governing body entrusted by the public to exercise in good faith their environmental mandate. TRCA's responsibilities include recognizing, protecting and maintaining vulnerable environments as specifically identified by ESA, ANSI and environmental report recommendations. TRCA has been an acting autonomous corporation managing waterfront roadway construction as an optional method of erosion control along the Scarborough Bluffs for over 40 years. To date, over 6 km. of natural

sandy shoreline has been hardened with a service roadway. “Friends of the Bluffs” contends that any new proposed SWP waterfront trail development requiring the diminishing of sandy beach shorelines is unacceptable.

At the second PIC meeting, the public presented a petition of over 500 names to protest the destruction of the Grey Abbey Park beach. As a resolution for an acceptable SWP plan, “Friends of the Bluffs” on behalf of the public presented TRCA with a thoughtfully considered and feasible alternate SWP plan. TRCA rejected our feasible plan based on a biased interpretation of the SWP objectives.

TRCA’s preplanned service road agenda precludes interest in neither what the public wants, nor the environmental degradation effects to the natural shoreline. The 10-15 year road building agenda appears to be TRCA’s works priority calculated to serve corporate long term interests. Therefore, TRCA’s “preferred option” is a breach of public trust.

c) Environmental Assessment process errors.

TRCA has failed to follow correct procedure during the PIC meetings. A clear deadline date was announced for the public to submit comments as a record for public input in preparing the Environmental Assessment report. The date was extended without proper public notification. Not being advised of the extension date the growing numbers of the public who disagree with the “road building option” did not submit their comments therefore distorting the recorded comments for consideration. No formal public announcements to rectify this mistake has been adequately communicated. Stakeholder committee members have requested and have been denied pertinent information. The January 2017 stakeholders meeting, an E.A. process requirement to include stakeholders input, was a complete failure. None of the stakeholders nor the comments of U. of T. Environmental student observers in attendance agreed with the destructive shoreline plan.

d) Misuse of public funding and wasteful spending.

- a) Funding an unnecessary waterfront roadway extension and a paved path through the forest floor at East Point to benefit TRCA’s works agenda is wasteful.
- b) A levy on the public’s water bill was approved to fund the \$1-3 million dollar cost to prepare an Environmental Assessment Report for the proposed SWP. The public deserves and expects an honourable EA report based on a well planned SWP that best reflects environmental recommendations and the public’s waterfront interests. TRCA’s SWP plan for EA approval appears to be a blatant disguise of a waterfront development to advance TRCA’s long term road building agenda. The plan is environmentally destructive and contrary to all environmental report recommendations. The sandy beachfront enjoyed all summer with multi use water activity usage will be destroyed and no new waterfront beach for the public to enjoy along the Guild Park waterfront has been offered.

- c) “Inaccessible due to private property” is a misleading argument in the EA draft. Mixed waterfront property ownerships along the Grey Abbey area shoreline have served to save the natural shoreline from unwanted corporate, industrial and commercial development. Corporate (TRCA) construction development requires expropriations that are hostile takeovers requiring property acquisitions that triple the legal costs of negotiations. The public is not informed of this costly real estate injustice that the public must fund. The power to expropriate is intended for use only where there is no other option. One of TRCA’s initial options was to leave as is (do nothing) thereby saving the sandy beach. The “Friends of the Bluffs” SWP option presented to TRCA does not require expropriations. Therefore, TRCA is abusing their statutory powers of authority by irresponsibly adding substantial public costs unnecessarily to the project. Recreational public usage of the beach has never been a problem. Trespassing is only an issue when people climb the cliff trying to find a path to the tableland or when a corporate entity enters with a determination to destroy the beach.
 - d) Costly erosion control headlands constructed in 2006 and 2016 would be wastefully destroyed to accommodate TRCA’S proposed waterfront roadway. The five armourstone headlands, constructed at substantial costs, successfully protect, collect, and maintain the sandy beaches at Morningside. TRCA fails to mention this costly headland destruction in the E.A. draft.
6. “Provide shoreline access to users of all abilities” is a controversial argument. Access for the disabled to enjoy a Scarborough Bluffs beach experience is available at Bluffers Park, the Rouge River, Port Union and can be made accessible at Beachgrove. Paving over the Grey Abbey beach shoreline to accommodate wheelchair accessibility is unreasonable since it will deny 100% of the public from ever enjoying a sandy beach shoreline with water accessibility.
7. A similar draft E.A. report could have been prepared for our alternate Plan 2. The objectives are clear and similar but specific.
- a) Provide an environmentally friendly SWP development that respects ESA and ANSI policies that will retain the 12,000 year old natural shoreline in perpetuity, and
 - b) Provide a multi-use, recreationally useful waterfront park and trail to safely meet the diverse water activity interests of the public.
8. The surfers association gave strong arguments against the “preferred option” along the western sector development at Bluffers Park that would destroy their water recreation activities. There are over 1,000 surfer members in Toronto some with Olympic aspirations that TRCA had not considered in their “preferred option” plan. The unique

naturalized surfing conditions would be destroyed and would impact serious safety issues to the surfers.

9. The notion that a “Danger zone” parameter, to mitigate future episodic cliff face failures along the Grey Abbey Beach is completely misleading, it is modeled on academic speculation and is in conflict with their recorded .3 m a year rate of erosion. The report claims that erosion will be a problem within a 60 year time period, this is false information. It would take over 100 years before erosion may be an issue. TRCA’s Geotech expert from Terraprobe confirmed to us that erosion could be stopped anytime using an engineered approved method of top filling that has been successfully applied along the bluffs. Furthermore, misleading erosion information was displayed on the picture panels at the PIC3. A photo of a major landslide slump that occurred west of Morningside had a caption “Grey Abbey Park land slide”. Grey Abbey Park is east of Morningside where no landslides have occurred along the natural shoreline. All major and minor slumps have occurred west of Morningside where TRCA erosion works have been completed.

In conclusion, TRCA’s “preferred option” may convince trusting Executive Committee members who have never visited or experienced the sandy shoreline at Grey Abbey Park. Not unlike TRCA, they may consider the natural shoreline to be a disposable commodity of little value.

Preserving 700 meters of natural beaches and adding a new reclaimed sandy beachhead along the 6 km. of hardened waterfront is a reasonable expectation with a \$170 million budget. We recommend that the Executive Committee and TRCA adopt Councilor Glenn DeBaeremaeker’s motion. To paraphrase “That TRCA staff aim to, during the detailed design process, examine ways and means to provide a short stay boat docking facility and a sandy beach at the Guild Park location as well as resting, picnic and play areas along the entire length of the waterfront trail”.

Yours respectfully,

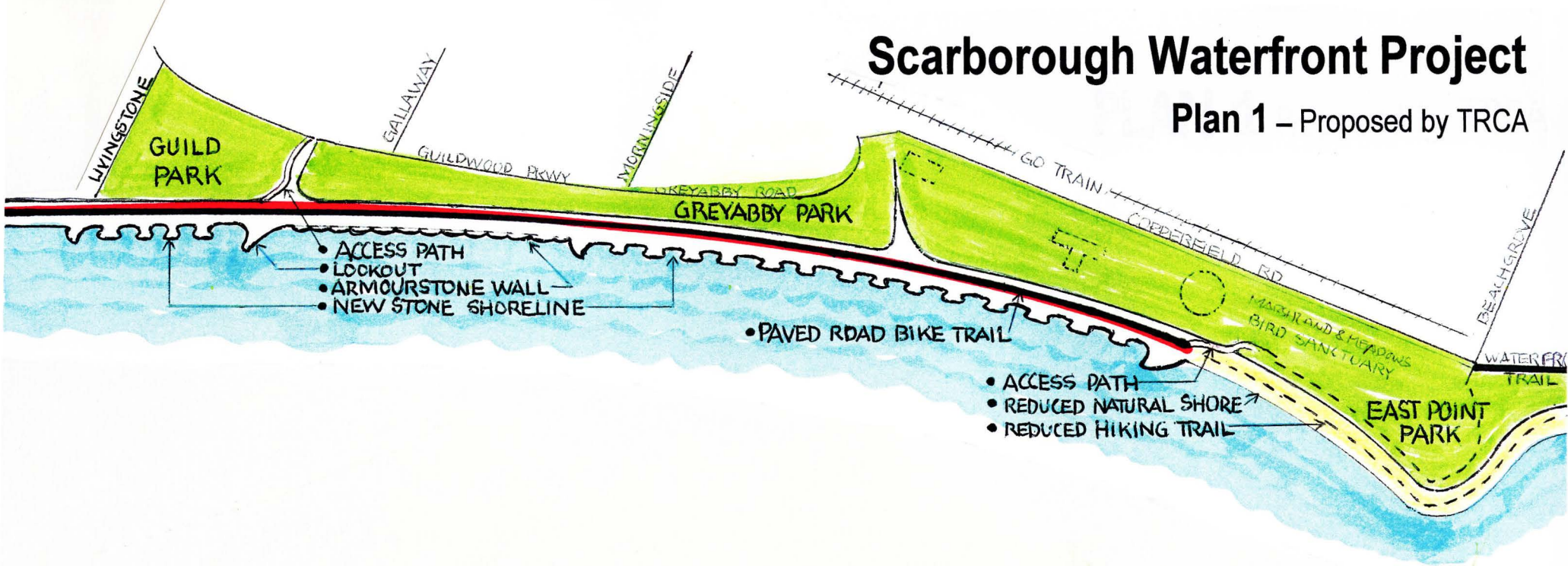
Roy Wright, President,

“Save Grey Abbey Beach”

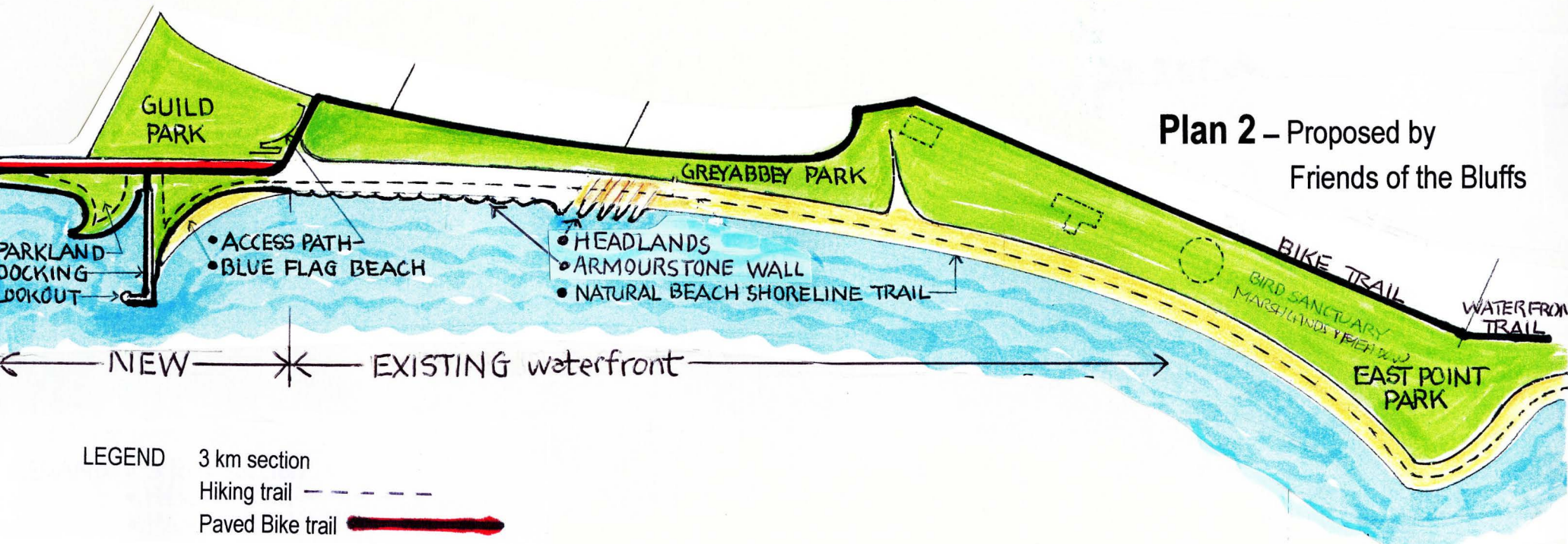
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Scarborough Waterfront Project

Plan 1 – Proposed by TRCA



Plan 2 – Proposed by Friends of the Bluffs



- LEGEND
- 3 km section
 - Hiking trail - - - - -
 - Paved Bike trail