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Deputation re 2018.EY31.4 on June 6, 2018 Etobicoke York Community Council

I am presenting this deputation on behalf of the High Park Natural Environment Committee. We have been advising the City on natural environment aspects of High Park for the last 25 years.

Toronto Council recently addressed the need to protect a 250 year old oak tree in a residential neighbourhood, a matter that drew considerable public attention. What we have here in High Park, in full sight yet unnoticed by many, is a 4000-year-old remnant of natural heritage: the provincially rare - and indeed globally rare - Black Oak Savannah. This rare habitat is one reason that a large portion of the park has been designated by the province as an Area of Natural and Scientific Interest, and in Toronto's Official Plan as an Environmentally Significant Area. These designations also extend to other sections of the park, including forested ravine slopes and Grenadier Pond.

The Ontario government's policies on land use planning are set out in the Provincial Policy Statement of 2014 (PPS 2014). PPS 2014 requires municipalities to protect the natural heritage for the long term. The province has issued a guideline, the Natural Heritage Reference Manual, to help municipalities understand how to meet this obligation. Municipalities need to either follow the guideline or take measures that have the same effect, and explain how the effect is achieved.

In the case of High Park, the City of Toronto needs to show there will be no negative impacts from development activities on adjacent lands. Negative impacts may be direct, such as directly destroying all or part of the natural heritage feature, or they may be indirect. Indirect impacts include compromising ecological functions through development of adjacent lands, or human disturbance and related problems such as trampling, soil compaction and introduction of invasive species.

Dougan & Associates has prepared a Natural Heritage Impact Study as part of the Bloor West Village Avenue Study. We agree with the consultant's findings that the direct negative impacts "are anticipated and readily mitigated". We also agree with their statement that "indirect impacts (especially in High Park) are complex, requiring coordinated management, policy enforcement and cooperation affecting many parties."

The Black Oak Savannah and Woodland portion of High Park has had a management plan in place since 2002. This has brought about major restoration efforts, but the accomplishments continue to be undermined by inappropriate and negative human impacts such as trampling and disturbance of wildlife. We agree the management plan should be updated to reflect current realities, such as the tremendous intensification of Toronto in the intervening years and the increased pressure of recreational demands on green spaces. The update should also include management strategies for Grenadier Pond, which is currently a bit of an orphan.

The City's obligation under PPS 2014 extends to its own lands in High Park. A comprehensive process must be put into effect to ensure this requirement is met: that development and site alteration adjacent to the High Park Area of Natural and Scientific Interest (ANSI) shall have no negative impacts on a cumulative basis, either direct or indirect. Also, a reliable process is needed to ensure that all City departments and their contractors adhere to the management plan.

Finally, we recommend that the considerable protection afforded on paper by High Park's protected status be implemented in practice. This will require the allocation of adequate resources, education, enforcement, and science-based practices including ongoing monitoring to drive adaptive management to human disturbance.

Torontonians treasure High Park and flock to it for a variety of recreational pursuits, yet most do not know or appreciate the park's significance as a natural heritage site dating back at least 4000 years. As human pressures on the park continue to grow, we run the real risk of "loving High Park to death". Trees and grass may remain, but the special qualities and features that make High Park a natural heritage treasure could too easily be lost. Fortunately, this planning process has focused attention on the need to protect High Park's natural heritage for the long term. We urge you to ensure that the necessary protections are put in place to achieve this goal for present and future generations.

Leslie Gooding, Co-Chair, High Park Natural Environment Committee