

**EY32.4_Submission__Final Report HPANCH Study Area_Urban Design Guidelines_EYCC July 4
18_Lenka Holubec**

"One of the challenges that we have is that we are experiencing something of a vortex sucking all kinds of growth right into the heart of the city. One of the really important roles for municipal government to play is to ensure that we have clarity as to where growth will go, as well as where growth won't go.

Seventeen per cent of our city is ravines; we've just brought forward additional environmentally sensitive areas. We don't want growth in those areas. There are also some areas that have heritage designations, and we want to be very careful in terms of how we manage growth in those areas."

**Former Chief City Planner Jennifer Keesmaat on how to fix Toronto By Riley Sparks in News, Politics
from April 21st 2017, National Observer**

Dear Councillours,

Toronto is now a city on one hand aspiring to become a leader in championing Urban Biodiversity and other environmental concerns, on the other hand making the planning decisions impacting one of the most significant city's Natural Heritage - High Park.

It was crucial that the City Council consideration on Final Report HPANCH Study - OP Amendment No. 419 & SASP No. 551 was fully consistent with 2014 Provincial Policy Statement and the City Official Plan policies that are here to protect designated natural heritage for the long term.

As presented today, High Park Apartment Neighbourhood Area Urban Design Guidelines (June 2018) seem too vague to provide for consistency with natural heritage protection requirements as expressed in PPS 2014 and other relevant policies.

Only sustainable density and corresponding user demands from nearby area combined with best management strategies is solution for natural heritage if it is to be preserved for the long term as PPS intends.

High Park is an irreplaceable natural asset and biodiversity hot spot, connecting Humber River south marshes with natural areas along the waterfront.

These natural places and wildlife habitats have low "wear tolerance" and deteriorate relatively quickly under conditions of overuse. Watersheds and hydrological features once impacted are difficult to restore.

This one of a kind natural asset was to provide Torontonians with connection to natural wonders and respite within the city, while playing a vital part within Toronto's ecosystems to be protected from impacts of development and preserved for the long term.

The number of subway stations along Bloor St.W frontage with High Park and BWV corresponded to this vision of linkages to the Waterfront and desirable city's destinations rather than being intensification transit oriented.

Between 2012 and 2015 the City and Province have designated ESA/ANSI's in Toronto and elsewhere and corresponding legislative changes ensuing into mandatory policies to provide a planning tool for provincial and municipal intent to protect these natural areas from development within and in respect to adjacent development and resulting degradation.

These Natural Heritage Systems are protected by the policies of Growth Plan for GGH 2017, Provincial Policy Statement 2014, The City Official Plan 2015 Office and Natural Heritage Reference Manual - the Official Provincial Policies Guideline.

PPS 2014 came to effect in April 2014 with no transition period.

Section 3 of the Planning Act requires that all decisions and advice affecting land use planning matters "shall be consistent with" the Provincial Policy Statement.

The "shall be consistent with" standard is a strong implementation standard that focuses on achieving policy outcomes.

When it comes to **Growth Plan for the Greater Golden Horseshoe**, some argue that it rules supreme in the city of Toronto, nevertheless they fail to mention that Growth Plan is also a planning instrument to protect natural heritage.

Growth Plan for the Greater Golden Horseshoe, 2017, May 2017

http://placestogrow.ca/index.php?itemid=14&id=430&option=com_content&task=view#1.

1.2.3 How to Read this Plan Relationship with the Provincial Policy Statement (PPS)

*"As provided for in the Places to Grow Act, 2005, this Plan prevails where there is a conflict between this Plan and the PPS. **The only exception is where the conflict is between policies relating to the natural environment or human health. In that case, the direction that provides more protection to the natural environment or human health prevails.**"*

Over next years the area across of High Park could see approx. 1000 more people from already existing construction 2x25 towers near High Park subway station (51 Quebec Ave.), 2000 more people from BWVA Study and **3000 more new residents from HPANCH Study as considered on JUNE 28 by the City Council.**

The areas of BWVA Study and HPANCH Study were substantially developed over past years, adding about 3000 more residents in High Park's proximity even prior to the City launching of BWVA Study in Feb 2017 followed by HPANCH Study later (See list of development preceding these Studies below text)

According to the Desktop Investigation by Dougan & A done for BWVA Study in the Fall 2017, all key natural features in High Park are under stress and show a high level of disturbance, while in 2012 according to Report done when portions of High Park were designated as ESA, they found ANSI in good condition.

There is no doubt that overuse resulting from increasing density in High Park's proximity and daily high impact use, including by dog walkers and other recreational use, is impacting ESA/ANSI, its ecological function and causing biodiversity to decline.

We do not need to get deeply involved with sometimes complex directions and provisions of the policies relevant to protection of natural heritage to make a conclusion that by adding not hundreds but thousands more residents and future daily park users, including pets, in proximity of High Park is a recipe for rapid decline of this natural area as ecosystem.

Most of people do understand that by increasing user demands by thousands more users, capacity of natural areas to provide habitat to significant wildlife (reptiles, migratory birds stopover, waterfowl, mammals, insects, etc.) and sensitive flora will be increasingly diminished and degraded.

Ecological function of High Park's ANSI and watershed are the most susceptible to indirect cumulative impacts.

In this respect, the City Council's recently adopted OP Amendment No. 419 & SASP No. 551 is not consistent with PPS 2014 as it does not satisfy requirement asking proponents of development to demonstrate that there will be no negative impacts on the natural heritage, natural heritage features and ecological function due to single, multiple or successive development.

PPS 2014

"2.1.8 Development and site alteration shall not be permitted on adjacent lands to the natural heritage features and areas identified in policies 2.1.4, 2.1.5, and 2.1.6 unless the ecological function of the adjacent lands has been evaluated **and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions.**"

Best Regards,

Lenka Holubec, participant in BWVA Study LAC and HPANCH Study Working Group

High Park Apartment Neighbourhood Area Urban Design Guidelines_July 2(June 2018)

<http://www.toronto.ca/legdocs/mmis/2018/ey/bgrd/backgroundfile-118163.pdf>

My Comments in Blue:

Natural Heritage

Wording is too vague to provide commitment and consistency with natural heritage protection as expressed in PPS 2014.

My Comments in Blue:

1.2 NATURAL ENVIRONMENT

The High Park Apartment Neighbourhood is located at a local topographical high point between two natural watercourses and north of High Park, which is an area of provincial and municipal significance with lands identified as Area of Natural and Scientific Interest (ANSI) and Environmentally Sensitive Area (ESA).

Potential environmental connections between the High Park Apartment Neighbourhood area and surrounding natural features and functions, particularly within High Park, are explored in a Natural Heritage Impact Study (NHIS), completed in March 2018 as part of the Bloor West Village Avenue Study, as well as a NHIS Addendum (May 2018), carried out as part of the High Park Apartment Neighbourhood Area Character Study.

Due to the presence of sensitive surface water features within High Park, namely Grenadier Pond and Spring Creek, hydrological and hydrogeological reports were also prepared as part of the Bloor West Village Avenue Study. The High Park Surface Water Features - Narrative (February 2018) and Desktop Hydrogeological Investigation (April 2018) include findings and recommendations that are applicable to the High Park Apartment Neighbourhood area.

Both SASP 551 and these Urban Design Guidelines implement recommendations from the NHIS, NHIS Addendum and water-related studies described above and are to be read in conjunction with these environmental studies and reports.

A Biodiverse Landscape Manual developed for the area is also to be referenced together with SASP 551 and these Guidelines in order to design public and private landscapes that support the natural environment of High Park.

Natural Environment

Support and enhance the natural environment, including the natural heritage and hydrologic features and functions in High Park, and foster sustainability within and adjacent to the High Park Apartment Neighbourhood.

Recommended change:

Protect natural heritage, designated natural features, ecological function, hydrologic features and functions in High Park for the long term.

Implement policies relevant for protection of natural heritage included the Growth Plan for GGH 2017, PPS 2014, NHRM - provincial policies official guideline, City Official Plan and OPA 262 (Environmental Policies)

Support and enhance the natural environment and foster sustainability within and adjacent to the High Park Apartment Neighbourhood.

- Protect and preserve existing mature trees, vegetation and wildlife habitat wherever possible.
- Introduce more native tree and plant species, biodiverse landscapes and green roofs, and low impact development strategies into the design of streets, parks and private properties.
- Promote innovative, energy-efficient and sustainable design.
- Maintain and increase opportunities for groundwater infiltration.
- Avoid deep underground structures that disturb natural groundwater flows.
- Integrate bird-friendly measures throughout all aspects of site and building design, including retrofit opportunities.
- Preserve unencumbered soil to support mature trees, water infiltration and opportunities to expand the public realm.

Unencumbered soil means areas not covered by buildings or structures both above- and below-grade, which is important to water infiltration and mature tree growth, as well as potential

future public street or public parkland opportunities.

2.1 NATURAL HERITAGE & WATER

High Park is one of the City's most significant natural areas due to its large size, globally rare habitat types and provincially and municipally significant natural areas. The High Park Apartment Neighbourhood is located north of High Park and lands identified as Area of Natural and Scientific Interest (ANSI) and Environmentally Sensitive Area (ESA). Over 50 species of birds are known to breed in High Park and the park is recognized as a significant stopover for migratory birds.

The High Park Apartment Neighbourhood is situated within the Humber River watershed, located above and/or in close proximity to a deep aquifer, the Laurentian Channel, which is a pressurized ancient subterranean aquifer flowing from Georgian Bay to Lake Ontario, which discharges to the Spring Creek catchment through a constructed well. Groundwater and surface water sources within the area contribute to High Park water features, including Spring Creek and possibly Wendigo Creek and Grenadier Pond.

The Natural Heritage Impact Study (NHIS) prepared by Dougan & Associates for the Bloor West Village Avenue Study (March 2018) and the Addendum for the High Park Apartment Neighbourhood (May 2018), identify recommendations for avoidance, mitigation and enhancement opportunities to address the potential direct and indirect impacts of development within the area on protected

natural features and functions.

My Comment:

Only sustainable density combined with best management strategies is solution for natural heritage if it is to be preserved for the long term as PPS intends.

NHIS prepared by Dougan & A is a Desktop Study and as such cannot be used for conclusions on indirect cumulative impacts due to future increase demands from proposed development and/or determining of density increase in HPANCH Study

Existing impacts and all relevant conditions must be first examined along detailed assessment process described in NHRM_13.00 Addressing Impacts of Development and site Alteration.

The Study is to take place this summer in High Park. Public participation and transparency of this process is essential.

Addendum for HPANCH Study is not claiming to have information sufficient to make any conclusion on Indirect and Cumulative Impacts resulting from increased demands on natural heritage and ecological function.

Dougan & A are suggesting that mitigation measures along best management strategies, policy enforcement, etc. exist but they do not conclude that these measures alone would be sufficient to protect High Park's natural heritage along PPS 2014.

"The magnitude of indirect and cumulative impacts from new development in the HPAN are largely dependent on the projected population growth in the BWVA corridor, the HPAN, and their use of High Park and thus are difficult to predict."

Addendum for HPANCH Study, Dougan&A Consulting, May, 2018

"6. The potential for indirect impacts to nearby natural heritage features, such as the High Park Oak Woodland ANSI, has been a major concern of stakeholders throughout the project process. Mitigation measures to address indirect and cumulative impacts are not detailed in this report as implementation of these measures is complex, requiring coordinated management, policy enforcement and cooperation affecting many parties.

6.2 Consideration of Indirect and Cumulative Impacts The magnitude of indirect and cumulative impacts from new development in the HPAN are largely dependent on the projected population growth in the BWVA corridor, the HPAN, and their use of High Park and thus are difficult to predict."

The Natural Environment policies of Site and Area Specific Policy 551 for the High Park Apartment Neighbourhood Area implement avoidance, mitigation and enhancement recommendations related to the natural heritage and hydrologic features and functions found in proximity to the area, most notably within High Park.

My comment:

This above statement is implying that PPS 2014 requirements are met by SASP 551 which, in my opinion, and from reasons described in this submission and other previous communications to EYCC and CC is not accurate.

OP Amendment No. 419 & SASP No. 55 addresses hydrologic issues but fails to address indirect cumulative impacts from increase user demands on natural heritage in High Park from a proposed redevelopment infill (approx. 3000 Pop) and resulting change of use - significant increase of user demands affects negatively designated natural heritage features and ecological function in a complex and difficult to mitigate ways.

Therefore, OP Amendment No. 419 & SASP No. 55 is not consistent with

PPS 2014:

2.1.8 Development and site alteration shall not be permitted on adjacent lands to the natural heritage features and areas identified in policies 2.1.4, 2.1.5, and 2.1.6 unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions.

6.2 PET-FRIENDLY FACILITIES

My comment:

On this issue, I have commented previously and submitted comprehensive materials descriptive of this very serious issue of dramatically increasing number of pets in proximity of natural heritage.

The measures described is nice to have but these will not resolve very serious impacts on wildlife and other natural features due to increase demands from increased number of pets on Park and DOLA.

As a matter of fact existing DOLA in High Park may be reviewed as a result of significantly increased density in High Parks' proximity to prevent rapid acceleration of degradation.

Additional DOLA may need to be created in non designated local park or other area to deal with demands from additional density.

All existing and new residents should receive education packages on "Dogs in Natural Areas" to mitigate impacts of dogs on wildlife and water quality in designated natural areas.

Dog and cat ownership within the High Park Apartment Neighbourhood area is among the highest in the city. Designated on-site facilities for pet use are important to effectively manage the needs of the local pet population, mitigate potential negative impacts on public health and the natural environment and minimize conflicts with other areas intended for human use.

1. Provide dedicated dog relief areas and other indoor and outdoor pet-friendly facilities on site to minimize conflicts with the quality and enjoyment of other passive and active recreation areas within the block and to mitigate pressures from pet use within local parks and High Park.

2. Install mulch within designated dog-relief areas and other pet-designated outdoor spaces and provide hose bibs and drains connected to the sanitary sewer, as appropriate, to clean and maintain pet relief areas.
3. Provide indoor pet wash and grooming facilities with direct access from outdoor pet-friendly areas.
4. Areas dedicated to pet use are considered above and beyond the indoor and outdoor amenity requirements to serve residents within a development

Background Information:

“It's easy to make mistakes when you're building North America's fourth-largest city”

Chief City Planner Jennifer Keesmaat on how to fix Toronto By Riley Sparks in News, Politics from April 21st 2017

<http://www.nationalobserver.com/2017/04/21/news/chief-city-planner-jennifer-keesmaat-how-fix-toronto>

Excerpts:

National Observer spoke with Keesmaat recently about the myth of the short commute and the challenge of balancing growth, affordability and character in one of Canada's fastest-growing cities, bringing nature back into the city and more. Here's a transcript of that conversation, edited for clarity and brevity:

Toronto has hit growth targets much earlier than expected. What can the city do to integrate more people, without building a condo on every corner?

"One of the challenges that we have is that we are experiencing something of a vortex sucking all kinds of growth right into the heart of the city. One of the really important roles for municipal government to play is to ensure that we have clarity as to where growth will go, as well as where growth won't go.

Seventeen per cent of our city is ravines; we've just brought forward additional environmentally sensitive areas. We don't want growth in those areas. There are also some areas that have heritage designations, and we want to be very careful in terms of how we manage growth in those areas."

We also recognize that there are areas that can benefit in a really significant way from growth. Our downtown, of course, 40 years ago there were a ton of surface parking lots. Today, we in fact are infilling the downtown, turning it into a truly walkable place.”

“I do get the sense, though, that when you look at the south end of Toronto, for example, there is the appetite to build those kind of condos basically forever. How can you rein in the market without driving developers away? Is it just that Toronto is a desirable enough place to live that the market will respond, even with those restrictions in place.”

“The new model is really about saying let’s work with nature let’s actually recognize that we want to bring nature into the city. We want wildlife in the city, we want trees in the city. This is a critical part of creating a livable urban environment, as opposed to the city noir, the concrete jungle. We’ve recognized that’s actually pretty hard on human health.”

“We are growing so quickly that on the one hand, we’re transforming the city, and on the other hand there are these ways that we need to be changing the key infrastructure of the city, like the use of the ravines, like the use of our streets, making them more into people-places as opposed to car-places. The risk is that if you add lots of growth but you don’t actually catch up quickly, that you’re going to begin to destroy the quality of life in the city.”

“Natural areas are vulnerable to heavy use, as they have low ‘wear tolerance’ and natural ecosystems deteriorate relatively quickly under conditions of overuse.

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.

The use of parkland needs to be compatible with its physical capacities. Parks, Forestry and Recreation currently has little data on how many people use city parks, how parks are used, and how high levels of use impact parks. This makes it challenging to prevent issues that might arise and as a result problems are dealt with case-by-case, often once damage has already been done.”

Parks Plan, 2013-2017

<http://www.toronto.ca/legdocs/mmis/2013/pe/bgrd/backgroundfile-57282.pdf>

“Since early 90th, there was a growing awareness in the City of Toronto of having to protect remaining valuable natural areas – ecosystem approach to prevent undermining and destroying of these irreplaceable assets.

“Too often in the past, we have considered green space as an afterthought, what was left over after development took its course. We now realize that if any natural spaces are to remain, we must take a pro-active approach to saving them”.

"Policies aim to strengthen the role of High Park as a valuable natural and recreational resource within Metropolitan Toronto and improve linkages to the Metropolitan Waterfront."

"High Park consists of approximately 162 hectares of natural landscape including woodlands, creeks and ravines in addition to variety of recreational facilities. It is one of the most significant natural areas along the Metropolitan Waterfront. Due to its size and proximity to Lake Ontario, it contains varied plant communities which provide diverse habitat for wildlife. Policies aim to strengthen the role of High Park as a valuable natural and recreational resource within Metropolitan Toronto and improve linkages to the Metropolitan Waterfront."

Metropolitan Waterfront Plan, prepared by Metropolitan Planning Department, Feb 1994

<http://trca.on.ca/trca-user-uploads/MetropolitanWaterfrontPlan.pdf>

Growth Plan for the Greater Golden Horseshoe, 2017, May 2017

http://placestogrow.ca/index.php?Itemid=14&id=430&option=com_content&task=view#1

1.2.3 How to Read this Plan Relationship with the Provincial Policy Statement (PPS)

"As provided for in the Places to Grow Act, 2005, this Plan prevails where there is a conflict between this Plan and the PPS.

The only exception is where the conflict is between policies relating to the natural environment or human health. In that case, the direction that provides more protection to the natural environment or human health prevails."

Prior development projects completed or under construction in areas of BWVA Study and HPANCH Study:

- 2452 Bloor St West

14 storeys, **244 units** 2017 submitted development application completed,

- 2265 Bloor St West 2017 submitted development application completed

8 storeys, **83 units**

- 2115 Bloor St West, 60 Harcourt Rd. 2017 2016 development application submitted, approved 7 storeys, **45 units.**

- 2114 Bloor St West 2015 development application submitted, 2017 - construction in progress

North Drive

8-storey residential apartment building containing **62units** with at grade retail Under construction.

- 51 Quebec Ave. (Grenadier Square) 2013 - application, 2017 under construction

2 buildings of 25 storeys, **528 units**

- 1990 Bloor St. West 2013 - application submitted, 2017-construction completed

North Drive

11-storey mixed use building. The new building has **104 residential** units.

-**200 Keele St.** 2016 - application submitted. Proposed development of a 4-storey, **52-unit** residential apartment
15 rental units, **37** condominium ownership units

- **248 HIGH PARK AVE** 2017 development application completed
79 residential apartment units.

- **1884 Bloor St.** 2011 - application submitted, 2015 - construction completed
14 Storeys, **378 units**

- **20 Gothic Ave.** 2009 Construction completed
8 storeys, **175 units**

- **338 Ellis Park Rd.** 2006 Construction completed.
10 Storeys, 46 units.

- **70 High Park Ave** 2005 Construction completed
169 suites built over top an historic heritage church

Previous communications to EYCC and CC in respect to HPAN?CH Study_ Lenka Holubec

City Council consideration on June 26, 27, 28 2018

<http://app.toronto.ca/tmmis/decisionBodyProfile.do?function=doPrepare&meetingId=13091#Meeting-2018.CC43>

EY31.4 Final Report - High Park Apartment Neighbourhood Area Character Study (Ward 13 - Statutory: Planning Act, RSO 1990)

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2018.EY31.4>

Communication (June 25, 2018) Submission from Lenka Holubec (CC.New.EY31.4.49) SEE EXCERPT BELOW

(<http://www.toronto.ca/legdocs/mmis/2018/cc/comm/communicationfile-85166.pdf>)

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2018.EY31.4>

Final Report - High Park Apartment Neighbourhood Area Character Study

Etobicoke York Community Council consideration on June 6, 2018

Communication (June 5, 2018) E-mail from Lenka Holubec (EY.New.EY31.4.40)

(<http://www.toronto.ca/legdocs/mmis/2018/ey/comm/communicationfile-83276.pdf>)

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2018.EY29.3>

Status Report - City Initiated High Park Apartment Neighbourhood Area Character Study - Apr 4 EYCC consideration

Communication (April 4, 2018) Submission from Lenka Holubec (EY.New.EY29.3.1.)

(<http://www.toronto.ca/legdocs/mmis/2018/ey/comm/communicationfile-79338.pdf>)

Excerpt from:

(June 25, 2018) Submission from Lenka Holubec (CC.New.EY31.4.49)

(<http://www.toronto.ca/legdocs/mmis/2018/cc/comm/communicationfile-85166.pdf>)

...The Official Plan Amendment No. 419 & Site and Area Specific Policy No. 551 must satisfy PPS 2014 requirement asking proponents of development demonstrate that there will be no negative impacts on the natural heritage, natural heritage features and ecological function due to single, multiple or successive development.

Therefore, at this point, I am urging you to consider bringing in the following 3 motions:

1. Requesting motion:

that the City Council DEFFERS DECISION on Final Report - High Park Apartment Neighbourhood Area Character Study and proposed Official Plan Amendment No. 419 and Site and Area Specific Policy No. 551, until the Study, fully satisfying PPS 2014 and Natural Heritage Reference Manual - PPS 2014 Official Guideline, scheduled to take place later this summer in High Park, is conducted, completed and findings are available for all relevant City staff planning decisions.

"To conform PPS 2014 and NHRM Official Guideline, The Study must be conducted first before reaching any conclusions in respect to development."

This is a strong PPS 2014 requirement. *"Regardless of the assessment undertaken, the level of detail must be sufficient to demonstrate that there will be no negative impacts on the natural features or their ecological functions."*

Natural Heritage Reference Manual

The Study of High Park ESA/ANSI to satisfy PPS 2014 and Natural Heritage Reference Manual (PPS 2014 Official Guideline) along NHRM 13.5 Impact Assessment Process is supposed to place this summer 2018 with TRCA involvement.

Without having results of this Study available adopting of Draft OP Amendment No. 419 & SASP No. 551 on June 26 by City Council will not be consistent with PPS 2014 requirements.

So far, there is only Desktop Study conducted for BWVA Study and HPANCH Study ADDENDUM but no field Study based on scientific research to provide PPS 2014 and NHRM required information including indirect cumulative impacts from increase user demands - "the likelihood of negative impacts occurring on the natural features or their ecological functions is definite or probable if the development proceeds under a given proposed design" - and carrying capacity of High Park's ESA/ANSI.

Parks Plan, 2013-2017

"The use of parkland needs to be compatible with its physical capacities. Parks, Forestry and Recreation currently has little data on how many people use city parks, how parks are used, and how high levels of use impact parks. This makes it challenging to prevent issues that might arise and as a result problems are dealt with case-by-case, often once damage has already been done."

2. Requesting motion:

That the City Council requests undertaking of municipal approach to determine the Extent of Adjacent Lands in respect to High Park ANSI beyond PPS 2014 and NHRM minimum requirement of 120m.

Given the concern that surrounding development is already stressing the capacity of natural heritage in High Park, City staff undertake public consultation, investigate and report back to Council by completion of the Study to take place in High Park this summer on the need for Council, under the municipal power and obligation to protect natural heritage provided by PPS 2014 and the City Official Plan - OPA 262 - to consider increasing boundary for adjacent lands for High Park for purposes of natural heritage development impact assessment that is wider than the current 120 m minimum guideline.

PPS 2014 Adjacent lands:

...

b) for the purposes of policy 2.1.8, those lands contiguous to a specific natural heritage feature or area where it is likely that development or site alteration would have a negative impact on the feature or area. The extent of the adjacent lands may be recommended by the Province or based on municipal approaches which achieve the same objectives.

PPS 2014 Policies Represent Minimum Standards

"The policies of the Provincial Policy Statement represent minimum standards. Within the framework of the provincial policy-led planning system, planning authorities and decision makers may go beyond these minimum standards to address matters of importance to a specific community, unless doing so would conflict with any policy of the Provincial Policy Statement."

<http://www.toronto.ca/legdocs/bylaws/2015/law1158.pdf> Maps 12A and 12B are included in this doc.

CITY OF TORONTO BY-LAW No. 1158-2015 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

Approved by Province in May 2016

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.”

Map 12B This refers to all areas in High Park designated as ANSI

3. Requesting motion:

Recommending changes in proposed Official Plan Amendment No. 419 and Site and Area Specific Policy No. 551 that NHIS (Natural Heritage Impacts Study) as stipulated in proposed SASP fails to address indirect cumulative impacts of increase user demands on natural heritage in High Park due to increase density resulting from a proposed development – up to 3000 more new residents

Chronic overuse is difficult if not impossible to mitigate. Ecosystems to be able to provide existing and significant wildlife habitat and maintain flora, fauna and biodiversity “The use of parkland needs to be compatible with its “physical capacities” - Parks Plan, 2013-2017

DRAFT OFFICIAL PLAN AMENDMENT TO THE OFFICIAL PLAN OF THE CITY OF TORONTO No.419:

...

Existing text:

c) Development/redevelopment **MAY** be required to provide a Natural Heritage Impact Study (NHIS)

which may include the study of, and recommended actions to address, the following:

Recommended change:

c) Development/redevelopment **WILL** be required to provide a Natural Heritage Impact Study (NHIS) which may include the study of, and recommended actions to address, the following

The Applicant shall work with staff from the appropriate City division(s) to develop suitable terms of reference prior to undertaking the NHIS to address (in addition to existing text):

- Indirect Cumulative Impacts due to proposed increase of density and resulting increase of user demands on natural heritage features and ecological function of High Park

- Carrying capacity of High Park natural heritage features to maintain ecological function and significant wildlife will be determined by a Study for each and all proposed development

The use of parkland needs to be compatible with its physical capacities. This is crucial in parks including ESA/ANSI. Each development proposal must demonstrate, whether further increase of density in the area in proximity of High Park is compatible High Park’s carrying capacity.

Provincial Policy Statement 2014 is asking that proponents of development demonstrate that there will be no negative impacts on the natural heritage, natural heritage features and ecological function due to single, multiple or successive developmen

Any future NHIS for the individual developments within HPANCH Study Area must be consistent and fully conform to PPS 2014 and NHRM (Natural Heritage Reference Manual) –Official Provincial Policy Technical Guideline.

More specific guidelines based on results of the Study to take place in summer 2018 and carrying capacity of High Park natural heritage, natural heritage features and ecological function need to be incorporated into NHIS City's guidelines requirements for HPANCH Study.

Addendum for HPANCH Study, Dougan&A Consulting, May, 2018

*"6. The potential for indirect impacts to nearby natural heritage features, such as the High Park Oak Woodland ANSI, has been a major concern of stakeholders throughout the project process. **Mitigation measures to address indirect and cumulative impacts are not detailed in this report as implementation of these measures is complex, requiring coordinated management, policy enforcement and cooperation affecting many parties.***

*6.2 Consideration of Indirect and Cumulative Impacts **The magnitude of indirect and cumulative impacts from new development in the HPAN are largely dependent on the projected population growth in the BWVA corridor, the HPAN, and their use of High Park and thus are difficult to predict.***"

Parks Plan, 2013-2017

<http://www.toronto.ca/legdocs/mmis/2013/pe/bgrd/backgroundfile-57282.pdf>

"Natural areas are vulnerable to heavy use, as they have low 'wear tolerance' and natural ecosystems deteriorate relatively quickly under conditions of overuse.

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.

The use of parkland needs to be compatible with its physical capacities. Parks, Forestry and Recreation currently has little data on how many people use city parks, how parks are used, and how high levels of use impact parks. This makes it challenging to prevent issues that might arise and as a result problems are dealt with case-by-case, often once damage has already been done."

End of Excerpt

Most of High Park is designated as ANSI (Area of Natural and Scientific Interest) and ESA (Environmentally Significant Area).

The areas were carefully selected to represent some of the most unique natural heritage features and significant flora and fauna in the Southern Ontario and Toronto to be preserved for the long term.

These biodiversity hotspots - Natural Heritage Systems are also protected by policies of Provincial Policy Statement 2014, Official Plan and Natural Heritage Reference Manual, the Official PPS 2014 Guideline.

Development within these protected natural habitats is generally not permitted. Development in areas adjacent or in proximity to these areas is governed by very specific policies to preserve natural heritage and ecological function for the long term from negative impacts of development, including impacting of hydrologic features, such as natural ponds, marshes and creeks.

Other long term impacts are related to increase user demands resulting from intensification near Natural Heritage areas. Impacts resulting from over use and increase of human disturbance is difficult if not impossible to mitigate.

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2018.PE28.1>

A Draft Biodiversity Strategy for Toronto

This item will be considered by Parks and Environment Committee on July 12.

The draft Strategy aims to increase the quality and quantity of natural habitat within the City in order to support healthier, more robust biodiversity and increase access to and awareness of nature. Once complete, the Strategy is intended to position Toronto as a leader in conserving urban biodiversity.

Urbanization has resulted in habitat fragmentation and loss that has significantly impacted Toronto's natural heritage, which has reduced the region's carrying capacity for native biodiversity.

Major Natural Systems:

The highest biodiversity in Toronto occurs within the Natural Heritage System (Map 1) which includes the city's significant natural heritage features and functions including habitats such as forest, wetlands, meadows, beaches and bluffs that provide shelter, food sources, and breeding areas for hundreds of species of plants and animals. The natural heritage system also supports the city's 86 ESAs which are primarily located within valleys, ravines and along the waterfront – areas which also function as important migration corridors through the city and beyond our boundaries. Habitat size is important. Relatively large areas of natural habitat are particularly important because they contain, or have the potential to contain, high quality habitats such as interior forest which are fundamental to preserving and enhancing native biodiversity such as Carolinian forest species. **Examples of relatively large tracts of high quality habitat are found in the Rouge Valley, Tommy Thompson Park, High Park, Toronto Islands and Lambton Park Prairie.**