From: Toronto Field Naturalists and Todmorden Mills Wildflower Preserve

TFN 2449 Yonge St. Suite 2, Toronto, Ontario M4P2E7

To: Mayor John Tory and Members of City Council

Regarding Item IE17.7 Clearing the Path Towards a Safe and Accessible Winter

Implications of a 'Comprehensive Snow Clearing Program' on Paved Paths in Ravines and Natural Areas.

Road salt is a serious issue for our natural areas impacting our lake, rivers and streams and the aquatic life in them. Terrestrial life is also affected as soil becomes salinated, weakening many native plants that are salt intolerant. This changes the conditions required for the insects, reptiles, birds and mammals to survive and complete life cycles. The result is that natural areas are degraded with an abundance of invasive species and low biodiversity. According to TRCA the monitoring of Chloride in Toronto's streams shows "the concentration of chloride in streams has shown an increasing trend. Increases in peak winter concentrations as well as summer baseline concentrations of chloride have been observed. This may be attributed to increases in road salt application on existing roads as well as the expansion of the road network. At present, the level of chloride in some urban waterways is sufficient to cause negative effects to some species of plants and animals. Principal sources of chloride contamination in streams include road salt applied to roadways, parking lots, and driveways."

(https://sustainabletechnologies.ca/home/urban-runoff-green-infrastructure/pollutionprevention/road-salt-management/)

In the past, just a few natural area paved paths were plowed. The snow covered valleylands were visited by walkers and cross-country skiers. With Covid 19 cases increasing and a lockdown in place in our city, many people are going outdoors to get exercise, relieve stress and improve mental health. Our neighbourhood parks and especially our Natural Areas and Ravine paths are being heavily used during this pandemic. So as a result, as we move into winter, now there is motion IE17.7 2 which will increase the snow clearing on many more paved paths in natural areas that previously were not maintained in winter so that they can be used for recreational purposes. If just plowing was done after a snow event within a valleyland paved path, that might have minimal impact if executed carefully, however, icing will occur under some winter conditions on these Natural Area paved paths. This raises a number of concerns: Will the city apply road salt adding a new amount of salt directly onto the natural area and valleyland trails that didn't exist in years past? Will locally important wetlands be impacted by a new salt burden that did not exist in the past (for example at Smythe Park or Beechwood Wetland)? Will a couple of employees in a city truck spread uncalibrated amounts of salt onto the paths in the valleylands using shovels, as occurs currently at some bus stops? Perhaps a sidewalk plow will be put to work in the ravine with the bucket on the back that drops salt onto the surface below, (but unfortunately which malfunctions regularly dropping piles of salt in heaps). What alternatives are there to road salt to make it safe for people to use the paved paths in the Natural Areas over this winter? The city has a responsibility to protect the

watercourses, wetlands, vegetation and habitats from the negative impacts of road salt application. How will that be achieved?

We respectfully ask that

1. no paved trails that are located in designated ESA's (Toronto Official Plan Map 12A) be included as part of the comprehensive snow clearing program.

2. No road salt be used on paved trails in Ravines and Natural Areas as part of the comprehensive snow clearing program.

3. In the subset of trails selected for the comprehensive snow clearing program alternatives to road salt with less impact on the natural environment be explored, such as less damaging chemicals and sand.

Thank you,

Paula Davies, President, Todmorden Mills Wildflower Preserve

Ellen Schwartzel, President, Toronto Field Naturalists







Over salting of the path to Todmorden Mills Park, 67 Pottery Road which includes Todmorden Mills Wildflower Preserve and ESA #81.

Note the natural area to the right which is a slope . No special care seems to have been taken near a vulnerable natural location.