

I am making this submission on behalf of ProtectNatureTO. We are an umbrella group advocating for the protection of wildlife and natural areas across the City of Toronto

We wish to express strong support for the Ravine Strategy Implementation Report and appreciation for the outstanding work of City Staff in providing a concrete plan to implement the Guiding Principles and Actions of the Toronto Ravine Strategy. We also thank Mayor John Tory for his advocacy of Toronto's ravines and urge the Executive Committee to take a leadership role in adopting the budgetary and other recommendations made in this report.

In the words of the 2017 Toronto Ravine Strategy: "all actions related to ravines should be guided by the overarching goal of protecting these spaces by maintaining and improving their ecological health" (pii). We recognize the challenges of balancing the needs for protection and restoration with public access; however, we urge City Council and City staff to keep the urgent needs for protection uppermost in mind when implementing the Actions recommended in this report.

Our ravines and other natural features covered by the Ravine & Natural Features By-law are not monolithic in their vulnerability to the impacts of overuse. Some can tolerate disturbance given suitable infrastructure; some are so rare or fragile they are intolerant of any disturbance, and no one but carefully selected researchers should go there. Most lie in between, so that the balance between accessibility and protection will have to shift with specific locations. This will be especially important in the ten Priority Investment areas which are in urgent need of attention and will also serve as a pilot and a model for restoration of other parts of our ravine system.

Where a natural feature is remote and the hinterland is sparsely populated, closing a trail serves to protect the feature from degradation. Closing a trail in Algonquin Park is a good example. Where the feature is found within a dense urban matrix, closing the trail results in an increase in the unacceptable level of degradation of the feature. High Park is a good example where intensive trampling by human visitors and their pets have resulted in degradation of its forests and wetlands. High Park is one of Toronto's largest Environmentally Significant Areas and almost half is a provincially-designated Area of Natural and Scientific Interest. More robust measures are needed to protect truly sensitive features.

Many protections are already in place through decisions of Council but require a protocol for implementation. Existing Official Plan Policy 3.4.14 states that activities within Environmentally Significant Areas will be limited to those that are compatible with the preservation of the features and their ecological functions. Implementing this direction requires a review of existing activities, both sanctioned and unsanctioned, and

effectively limiting those that are found to be destructive. Monitoring will be required both for ecological health and function and to ensure compliance with the appropriate activity level. The province's guidance material the Natural Heritage Reference Manual, especially Section 13, and Significant Wildlife Support Tools should be considered as a first approximation. The recently released High Park biological inventory includes a number of other scientific references to guide protective measures.

While Council should expect staff to implement OP 3.4.14, development proposals near provincially significant natural heritage features such as the High Park black oak savannah triggers the requirement under OP 3.4.15 to ensure the feature is protected for the long term, and this includes reducing the level of human disturbance within the feature to below the level that results in degradation.

As a group, ProtectNatureTO supports the actions outlined in the Ravine Strategy Implementation Report, but wishes to emphasize the legal framework for protection of natural features when planning decisions are made. This will be particularly important for the proposed Ravines Capital Planning and Design Coordination Working Group and the Ravines Unit within Parks, Forestry and Recreation.