

TE12.3_ProtectNatureTO Submission_Toronto and East York Community Council consideration on January 8, 20

299 Glenlake Avenue_Zoning By-law Amendment Application – Final Report



7 January, 2020

VIA E-MAIL: teycc@toronto.ca

Re: Toronto and East York Community Council consideration on January 8, 2020

299 Glenlake Avenue - Zoning By-law Amendment Application - Final Report

Dear Councillors,

We appreciate having this opportunity to comment in respect to Toronto and East York Community Council consideration on January 8, on 299 Glenlake Avenue – Zoning By-law Amendment Application – Final Report.

On behalf of ProtectNatureTO, a coalition of over 20 nature- and stewardship-based groups advocating for the protection of Toronto's remaining natural heritage, wildlife habitats and enhancement of natural areas across the City, we are writing to express our deep concerns over the long term cumulative impacts on High Park's unique natural heritage as a consequence of massive multiple and successive development proposals within the High Park Apartment Neighbourhood Study Area that could add over 5,000* more residents into this fragile ecosystem proximity.

Most of High Park is designated as ANSI/ESA and protected by the layer of policies, most importantly the PPS 2014 demanding the proponent of development to demonstrate through a Study consistent with this PPS's terms of reference no negative impacts on natural heritage features and ecological function due to *single, multiple or successive development or site alteration activities*. PPS 2014 was fully adopted into the City OP, as amended by OPA 262, May 2016, with respect to Environmental policies and Designation of Environmentally Significant Areas.**

"2.1.1 Natural features and areas shall be protected for the long term." PPS 2014

ProtectNatureTO is concerned that PPS 2014 fundamental requirement of the long term protection of natural heritage and ecological function may have been compromised in respect to the High Park's natural heritage and PPS 2014 required assessment process.

At this point, we are respectfully urging Toronto and East York Community Council to *defer* their decision on January 8, 2020 on 299 Glenlake Avenue - Zoning By-law Amendment Application - Final Report

until LPAT hearings are completed and the LPAT's decision on 35, 41-63, 65 and 95 High Park Avenue (GWL) and 66 and 102-116 Pacific Avenue (Minto) proposals is finalized.

There should be no development on the lands adjacent to High Park natural heritage unless proponents can prove that protection for the long term as required by PPS 2014 is assured through avoidance and mitigation as mandated by these policies.

The City of Toronto participated in the review and update of the PPS 2014 which includes new policies that address climate change, the promotion of green energy and conservation as well as policies pertaining to green infrastructure. **City Council's planning decisions are required to be consistent with the PPS 2014.** <https://www.toronto.ca/city-government/planning-development/official-plan-guidelines/official-plan/official-plan-review/>

The inclusion of new supportive policies on integrated watershed management, cumulative effects, climate change, green infrastructure and stormwater were additions in PPS 2014 and should be fully reflected in all relevant planning decisions.

Cumulative effects are those related to indirect impacts of development such as Surface Water Changes, Groundwater, Indirect Impacts to Wildlife and Induced Impacts (Increased Human Use) resulting from intensification and infill development in the neighbourhood.

“Natural areas are vulnerable to heavy use, as they have low ‘wear tolerance’ and natural ecosystems deteriorate relatively quickly under conditions of overuse.” Parks Plan, 2013-2017

Resulting increase user demands on natural heritage of population increase of over 5,000 residents in High Park Apartment Neighbourhood Study Area alone would put enormous stress on fragile ecosystem within High Park’s catchment area which according to recently adopted **Parkland Strategy** is in a 500 metre walking distance (or five to ten-minute walk): **Park Catchment**, a 500 metre walking distance (or five to ten-minute walk) along sidewalks, pathways, and local streets to a park.***

It is the City’s obligation to manage and protect public natural assets including making of the crucial planning land use decisions consistent with the relevant protection policies regulating natural heritage in Toronto.

Recently, the city adopted several efforts towards enhancing of biodiversity and protection of remaining city's natural heritage, namely Toronto Ravine Strategy and Toronto Biodiversity Strategy.

These efforts recognize Protection as a guiding principle together with Ecological Integrity and represent a continuation of 40 years of the initiative to protect core natural heritage in Toronto for the long term and future generations.

Toronto natural heritage and biodiversity depend on good planning decisions fully implementing existing protection policies, while integrating biodiversity initiatives and the long term protection of natural heritage into the planning and management of our urban areas.

Yours Sincerely,

Lenka Holubec on behalf of ProtectNatureTO

Background:

*In **HPANCH Study Area (19.6 Ha)** alone combined development proposals would add **1,637 units** and about **4,000** more residents into present about 8,500 population (based on 2016 census).

299 Glenlake Ave. additional 123 units, 750 units proposed by Minto and 764 by GWL (CC13.10, City Council consideration on December 17, 2019, 35, 41-63, 65 and 95 High Park Avenue and 66 and 102-116 Pacific Avenue - Request for Direction Regarding Local Planning Appeal Tribunal Hearing).

Furthermore, HPANCH Study Area is already accommodating soon to be completed 51 Quebec Ave. 2x25 storey towers adding 528 units and around 1,200 new residents.

Total population increase up to 5,500 from combined developments within HPANCH Study Area

****Amendment No. 262** to the Official Plan of the City of Toronto **with respect to the Environmental Policies and Designation of Environmentally Significant Areas** (OPA 262 - OPA 262: <http://www.toronto.ca/legdocs/bylaws/2015/law1158.pdf> CITY OF TORONTO BY-LAW No. 1158-2015 **Approved by Province in May 2016**

OPA 262 was approved by the City Council unanimously in 2015 and later in May 2016 approved by the Province, no appeals. It has officially adopted PPS 2014 changes into the City OPA.

All City Council decision dealing with development must conform to the planning act and PPS 2014 and OPA 262.

OPA 262, 2016

“The natural heritage system is important to the City, both within and beyond our boundaries and needs to be protected for the

long term. It is made up of areas where protecting, restoring and enhancing the natural features and functions should have high priority in our city-building decisions."

*****Parkland Strategy:**

<https://www.toronto.ca/city-government/accountability-operations-customer-service/long-term-vision-plans-and-strategies/parkland-strategy/>

The Park Catchment Tool, shown in Figure 07 is based on the following process:

1. **Park Catchment:** a 500 metre walking distance (or five to ten-minute walk) along sidewalks, pathways, and local streets to a park.
2. **Park User Population:** the total number of people a park serves within the 500 metre catchment.
3. **Park Supply:** the total amount of parkland that is accessible to residents, and reported as park supply per person

"The Park Catchment Tool provides a more realistic picture of parkland provision by accounting for actual travel distances between people and the parks they use. It more accurately represents the total population that shares a park and consequently, where new parks may be needed to address pressures on the system. The Tool results in maps that visualize parkland amount and distribution across the city."

[Final Parkland Strategy Staff Report](#)

[Final Parkland Strategy Full Report](#)

Indirect and Cumulative impacts of development:

Addendum for HPANCH Study, Dougan&A Consulting, May, 2018, NHIS provided for HPANCH Study explicitly states:

*"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

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

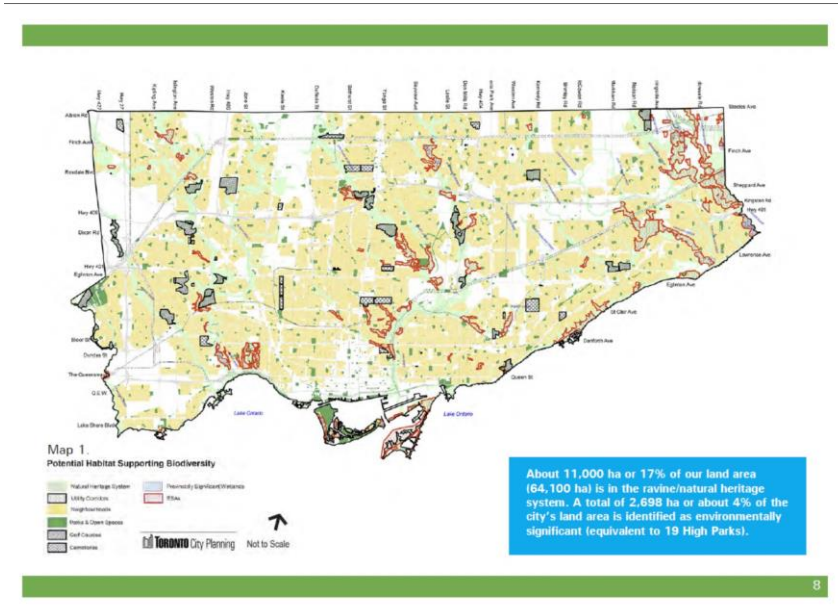
Natural environments have a threshold (or "tipping point") for disruption beyond which severe and possibly irreversible damage is done to ecological health. Knowing where thresholds exist and when they are reached is important for understanding and managing the impacts of use. It allows for the development of early warning systems to identify at-risk locations so that timely action can protect them." <http://www.toronto.ca/legdocs/mmis/2013/pe/bgrd/backgroundfile-57282.pdf>

Toronto Biodiversity Strategy

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.**



Application Support Material: Terms of Reference

<https://www.toronto.ca/city-government/planning-development/application-forms-fees/building-toronto-together-a-development-guide/application-support-material-terms-of-reference/>

The City website has yet to adopt PPS 2014 and OPA 262, 2016 into terms of reference (TOR) for Support materials regarding development proposals.

It is critical for the authorities to make an informed decision on development proposal based on an appropriate assessment consistent with the protection policies and guidelines.

Guidelines for Environmental Impact Studies are provided:

NHRM_ MNR 2010_13.0 ADDRESSING IMPACTS OF DEVELOPMENT AND SITE ALTERATION_Section

TRCA_EIS_Guideline_Jan23 2015bp.pdf

Other cities, such as London, Kitchener, etc. which city also have adopted PPS 2014 into municipal plans (such as Toronto - OPA 262, 2016), have published TOR, consistent with PPS 2014 policies right after the OP adoption:

<https://www.london.ca/business/Resources/Consultant-Resources/Pages/Environmental-Impact-Studies.aspx> The downloadable [Environmental Impact Study Guideline Document](#) (p.1-5) and [Checklist](#) (p. 6-7) provide more detail regarding your requirements with regard to undertaking an EIS, where necessary.