

EC21.14 Sustainable and Green Infrastructure Initiative for the Film Industry_Proposed Power Drop Pilot Project at Popular Filming Locations in Toronto_City Council consideration on May 5, 2021_ProtectNatureTO submission



May 5, 2021

VIA E-MAIL: councilmeeting@toronto.ca

RE: EC21.14 Sustainable and Green Infrastructure Initiative for the Film Industry - Proposed Power Drop Pilot Project at Popular Filming Locations in Toronto

Dear Mayor Tory and Council Members,

I am writing on behalf of ProtectNatureTO, a group advocating for the protection of wildlife and improvement of natural areas across the City of Toronto.

Thank you for this opportunity to comment on Sustainable and Green Infrastructure Initiative for the Film Industry - Proposed Power Drop Pilot Project at Popular Filming Locations in Toronto.

Committee Recommendations

"The Economic and Community Development Committee recommends that:

City Council direct the General Manager, Economic Development and Culture, in collaboration with the General Manager, Transportation Services and the General Manager, Parks, Forestry and Recreation, to develop a business and operational case for a pilot project to install power drops at popular filming locations for consideration as part of the 2022 Budget process or before, wherever possible."

For reasons described in this communication, **we request that:**

All City's Environmentally Significant Areas (or ESAs) and the Areas of Natural and Scientific Interest (or ANSIs)

and the natural areas adjacent to these protected natural areas (ESA/ANSIs) within 120m (this is Provincial Policy Statement minimum distance for the Impact Study requirement)

be permanently exempted from any consideration for *Proposed Power Drop Pilot Project at Popular Filming Locations in Toronto*

Commercial film productions and related activities, including car traffic, large vehicles, number of staff, gatherings, large footprint, noise, lights, night work, trampling, wildlife disturbance, etc. are not consistent with the fundamental requirement of the City Official Plan as amended by [OPA 262](#):

“Activities will be limited to those that are compatible with the preservation of the natural features and ecological functions attributed to the areas.”

Toronto’s ESAs are protected along the City of Toronto’s Official Plan in conformity with higher level policies (PPS, the Growth Plan, the Planning Act) to ensure maintaining/sustaining and preferably enhancing of these areas’ natural heritage features and protected ecological function for the long term.

For example, in respect to these ESAs: the Leslie Spit (Tommy Thomson Park), Toronto Islands and High Park, the ecological function as designated is: ***“notable area for migrant songbirds: 20% of migrant songbird records are from...”***

*“Over the past 17 years the most common migrant bird groups in Toronto have been warblers, shorebirds and sparrows. The most consistent and greatest migratory bird concentrations identified with this data are natural areas on the lakeshore. **The Toronto Islands, Tommy Thomson Park and High Park together account for more than 70% of the TOC’s migrant bird records for the period between 1990 and 2007.** Most of the remaining concentration areas are associated with some of the larger natural areas within the City, mainly located along the lakeshore and within the West Don and Humber Creek ravine systems.”* [Migratory Birds in the City of Toronto, A Literature Review & Data Assessment, FINAL REPORT August 2009 DOUGAN & ASSOCIATES](#)

Fundamental for the long term conservation of these precious natural areas are ***protection dedicated management plans*** in conformity with the corresponding legal means as provided for the City’s ESA in the City OP, 2019 consolidation, Chapter 3 - *containing policies to guide decision making based on the Plan’s goals for the human, built, economic and natural environments, 3.4 THE NATURAL ENVIRONMENT, 3-37*, the Provincial Policy Statement 2020 and The Official Guide to PPS, [Natural Heritage Manual, 2010](#)

City of Toronto is rich with the ravine ecosystem comprising 17% of city land, **yet only 4% is designated as Environmentally Significant Areas (or ESAs) or by the Province as the Area of Natural and Scientific Interest (or ANSIs).**

These natural areas provide invaluable ecoservices to us, while serving as vital habitats for wildlife and being crucial for regional connectivity of natural heritage systems.

There is a lot biodiversity in the Southern Ontario’s near-urban and urban protected natural area that could be counted on for achieving 25% of protected land in 2025 as Canada’s commitment target!

Yours sincerely,

Lenka Holubec on behalf of [ProtectNatureTO](#)

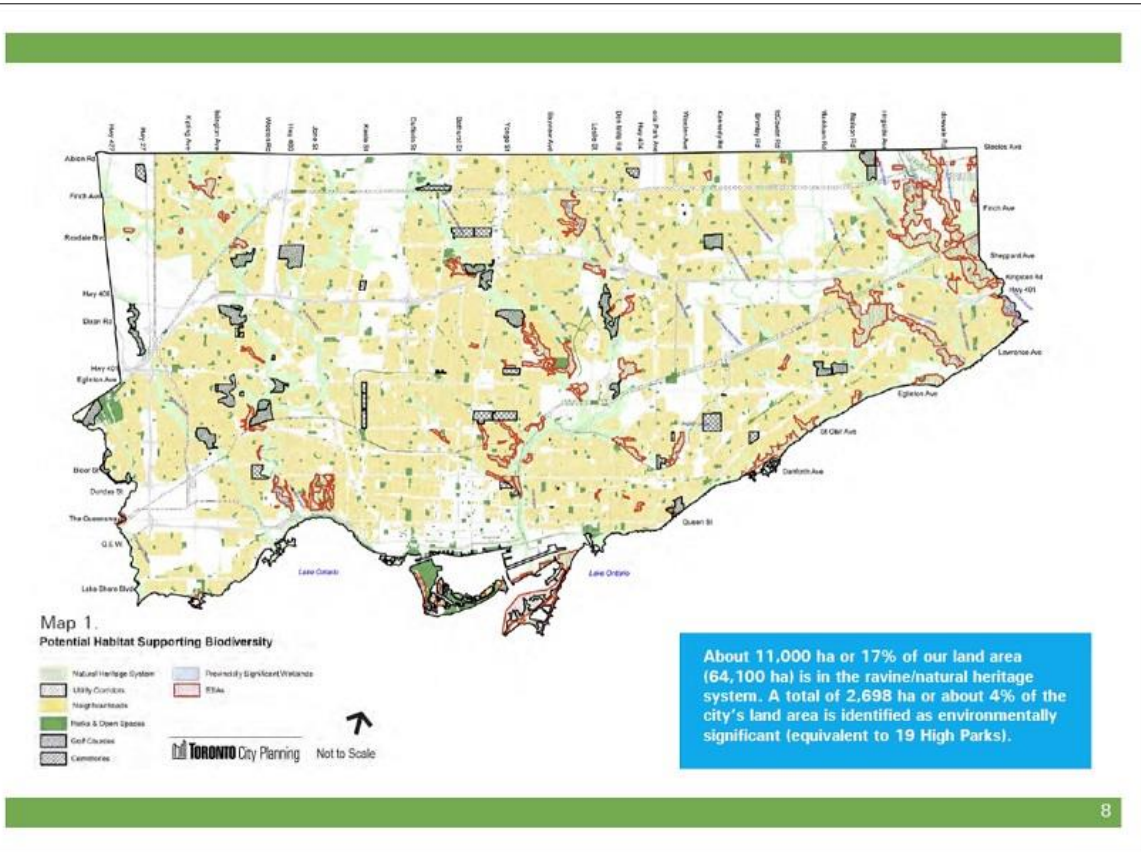
Background:

1. Toronto City Official Plan was amended in 2015 when city Council adopted [OPA 262](#) approved by the Province in May 2016. The OPA is in full force and effect:

Section 3.4 Natural Environment, Policy 13 second and third paragraphs are amended by:

*"Development or site alteration, with the exception of trails, where appropriate, and conservation, flood and erosion control projects, is not permitted on lands within the natural heritage system that exhibit any of these characteristics. **Activities will be limited to those that are compatible with the preservation of the natural features and ecological functions attributed to the areas.** New or expanding infrastructure should be avoided unless there is no reasonable alternative, adverse impacts are minimized and natural features and ecological functions are restored or enhanced where feasible. An impact study, as referred to in Policy 12, will be required for any proposed undertaking in those areas not already the subject of an Environmental Assessment under the Environmental Assessment Act. Known areas exhibiting these environmentally significant characteristics are shown on Map 12A. Where these areas extend onto lands above the top of bank which have underlying zoning permissions, the lands may be used to calculate permissible density in the zoning bylaw. An impact study, as referred to in policy 12, will be required for any proposed development adjacent to these areas. Any proposed development will avoid these areas, minimize negative impacts and, when possible, restore and enhance the ecological functions attributed to these areas".*

2. Biodiversity Strategy for Toronto_Potential Habitat_Supporting Biodiversity_Map



3. Office of the Auditor General of Ontario Value-for-Money Audit: Conserving the Natural Environment with Protected Areas

"At the time of our audit, only 10.7% of Ontario was protected and only 0.6% of southern Ontario was protected, the part of Canada that is the most biologically diverse and where biodiversity is among the most at risk because of the high human population."

The Mixedwood Plains Ecozone in the southernmost part of Ontario covers about 8.5 million hectares or 9% of the province's land area, is home to 13.5 million or 92% of Ontarians, and has 54,254 hectares of land conserved in provincially protected areas (see Figure 2). The Ontario Shield Ecozone covers 65.3 million hectares or 66% of the province, is home to 1.2 million or 8% of Ontarians, and has 7,575,634 hectares of land in provincially.

https://www.auditor.on.ca/en/content/annualreports/arreports/en20/ENV_conservingthenaturalenvironment_en20.pdf

4. Conservation Assessment for Southern Canada

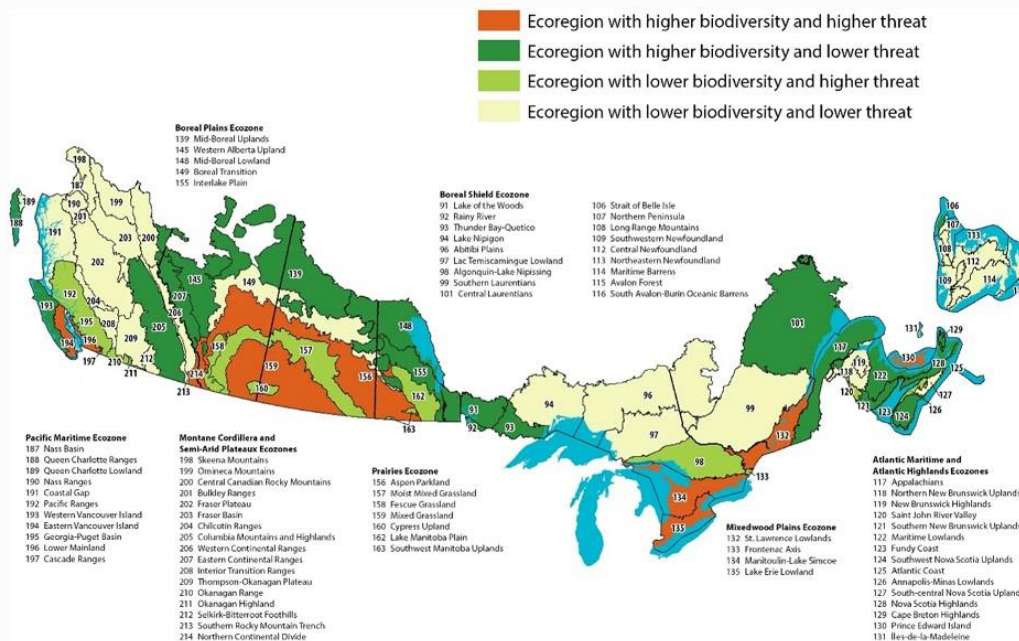
"The Nature Conservancy of Canada (NCC) has completed a comprehensive assessment of the conservation needs and opportunities in southern Canada. The first of its kind, the Conservation Assessment for Southern Canada (CASC) includes an analysis of many factors, including endangered species and habitats, land use and wildlife corridors. CASC classifies ecoregions based on their biodiversity and threats relative to other ecoregions in southern Canada and has recently been published in the journal Biodiversity and Conservation. Crisis Ecoregions: These are ecoregions that compared to other ecoregions in southern Canada have higher biodiversity and threats."

<https://storymaps.arcgis.com/stories/9ca69385ffc54cf6b9fdae925449d15d>

"Southern Canada is where most endangered species are and where most Canadians live. As a result, it's where our wildlife and habitats are at the greatest risk." <https://www.theweathernetwork.com/ca/news/article/first-of-a-kind-study-reveals-canadas-most-vulnerable-eco-regions-biodiversity>

Fig. 6

From: Southern Canada's crisis ecoregions: identifying the most significant and threatened places for biodiversity conservation



Map of study area showing final categories of ecoregions based on total biodiversity and total threat score