

IE30.9 Ravine Strategy Implementation Update City Council consideration June 15, submission Lenka Holubec

June 15, 2022

VIA E-MAIL: councilmeeting@toronto.ca

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Re: IE30.9 Ravine Strategy Implementation Update City Council consideration June 15, 2022 –

Dear Mayor Tory and Toronto City Councillors,

Thank you for this opportunity to comment on Ravine Strategy Implementation Update.

I am writing in support of:

“3. City Council affirm the importance of Environmentally Significant Areas and request the General Manager, Parks, Forestry, and Recreation to ensure that Environmentally Sensitive Areas best practices are being followed, to develop and implement appropriate staff training on Environmentally Sensitive Areas and request the General Manager, Parks, Forestry, and Recreation to work with organizations such as Toronto Field Naturalists to develop this training.”

Also, I am urging that Toronto Ravine Strategy, the initiative developed with a strong community support emphasizing PROTECT as a leading principle, becomes a vehicle for a full implementation of the city adopted protection laws in respect to the Environmentally Significant Areas.

Since most of Toronto’s Environmentally Significant Areas are located within the ravine system. it is critical that Toronto Ravine Strategy prioritize protection as a backbone of these efforts.

“Not surprisingly, the majority (87%) of Toronto’s environmentally significant areas (ESA) are found in the ravine system (City of Toronto, 2017). Within Toronto’s ESA’s there are 369 significant plant species, 175 species of birds and 16 species of reptiles and amphibians (City of Toronto, 2017).”

ECOSYSTEM SERVICE VALUES OF THE CITY OF TORONTO RAVINE SYSTEM, Prepared for the City of Toronto and Toronto and Region Conservation Authority, FINAL REPORT. July 25, 2018

<https://pub-trca.escribemeetings.com/filestream.ashx?DocumentId=5227>

The challenge remaining today is to protect on the ground of the Environmentally Significant Areas.

The intent to *“attempt to protect the most-important natural areas from destructive alteration”* dates back to early 80th and concluded municipally by the city of Toronto adopting OPA 262. 2015 OPA 262, BY-LAW No. -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.

<https://www.toronto.ca/legdocs/bills/2015/bill1173.pdf>

Protection is only achieved through the proper management of public use which is absolutely essential for conservation to allow protected natural features (such as native plants/trees, dunes, black oak savannah, etc.) and

ecological function (such as providing for migratory birds, other significant wildlife, seepage, wetlands communities) to continue and thrive.

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

Protection is based on precautionary principle to prevent harm. To protect management of public use must prioritize conservation over use.

Presently:

- the city has little control over public use of protected areas - the ESA/ANSI/PSWs
- non compatible activities continue to be permitted within the ESAs (e.g. DOLAs, dog walking, off leash dogs, recreational fishing is one of the leading drivers of biodiversity loss causing at some of the ESAs extensive harm to migratory birds/native turtles; gatherings, film permits, too intense use resulting in unsustainable use)
- damage and harm to protected ecosystems, fauna/flora is occurring in Toronto on daily basis and cumulative impacts are undermining the long term preservation of these unique natural areas and wildlife habitats rapidly

For Toronto Ravine Strategy to embrace ***“Toronto’s strong legacy of bringing forward leading edge policies that protect the natural environment, preserve and enhance biodiversity and address climate change”*** it must embrace and implement protection prioritizing management of protected areas, the ESA/ANSI/PSWs, to support the very features and ecological functions why these special natural places were protected.

Sincerely,

Lenka Holubec

member [ProtectNatureTO](#) and [High Park Nature](#)

Background:

PH34.1 Our Plan Toronto: Final Environment and Climate Change Official Plan Policy Updates

“The Official Plan updates presented in this report continues Toronto’s strong legacy of bringing forward leading-edge policies that protect the natural environment, preserve and enhance biodiversity and address climate change.”
 (May 11, 2022) Report and Attachments 3 to 5 from the Chief Planner and Executive Director, City Planning on Our Plan Toronto: Final Environment and Climate Change Official Plan Policy Updates
<http://www.toronto.ca/legdocs/mmis/2022/ph/bgrd/backgroundfile-225897.pdf>

OPA 262, BY-LAW No. -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.

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".

<https://www.toronto.ca/legdocs/bills/2015/bill1173.pdf>

“Protect

Every stakeholder group consulted in the development of this strategy emphasized that the protection of the system should be the number one priority. Actions outlined in the strategy to protect the system include: management plans for Environmentally Significant Areas, development and implementation of best practices, expansion of partnerships, and monitoring and reporting on ecological health.”

EX27.8 City Council consideration on October 2,2017

<https://www.toronto.ca/legdocs/mmis/2017/ex/bgrd/backgroundfile-106846.pdf>

***Environmentally Sensitive Area Planning in Ontario, Canada, July 1981, Paul F.J. Eagles, University of Waterloo**

Abstract

Environmentally Sensitive Area planning and management is a rapidly developing policy field in the Province of Ontario. It has been concentrated at the municipal planning level with a particularly strong relationship to the policy planning of the new regional governments. **Case studies have shown that there is a general consensus in society that municipal governments must attempt to protect the most-important natural areas from destructive alteration.** Key elements in the policy-implementation mechanism include: designation in official plans, establishment of technical advisory committees, development and use of detailed criteria, strong community interest and support, and the use of environmental assessment in cases of conflict. 27 references, 1 figure, 3 tables.

<https://www.researchgate.net/publication/240541724> *Environmentally Sensitive Area Planning in Ontario Canada*
Environmentally Sensitive Area Planning in Ontario