

2023.IE3.7 - High Park Movement Strategy - Final Report, City Council consideration on May 10, 2023, submission Lenka Holubec

May 9, 2023

VIA Email: councilmeeting@toronto.ca

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RE: 2023.IE3.7 - High Park Movement Strategy - Final Report, City Council consideration on May 10, 2023_ submission Lenka Holubec

Dear City Councillors,

Thank you for this opportunity to comment on **High Park Movement Strategy - Final Report**.

Car free future for High Park makes sense considering deepening climate crisis. Some members of public maintain that car-free High Park would also best support our TransformTO, VisionZero and ActiveTO goals.

Unfortunately, High Park Movement Strategy so far is not a vehicle to take us there because it fails to prioritize protected nature and it lacks relevant criteria to evaluate proposed [Preferred Strategy](#) from protection lenses perspective including potential negative impacts on designated natural features and ecological function of High Park.

Recommendations:

1. **High Park is such a significant biodiversity hotspot that it is more relevant and critical now to pursue Toronto's biodiversity goals and fund a detailed management plan, including public use for protection priority which is fundamental to conservation/protection of this rare ecosystem and continued support of biodiversity.**

Biodiversity is in a severe decline locally and globally. The city adopted policy goals not just in respect to climate and net zero but also towards biodiversity "**Protection and enhancement of the City's natural heritage system.**"

[Our Plan Toronto: Draft Environment and Climate Change Official Plan Policy Updates](#) just recently proclaimed:

"The City of Toronto has a strong legacy of introducing leading-edge policies to protect the natural environment and address climate change...This Official Plan update emphasizes achieving net zero emissions and climate adaptation and reliance. Protection and enhancement of the City's natural heritage system and water resource systems is a key element of climate adaptation and resilience."

2. **HPMS should not be concluded/advanced prior to High Park's Master Plan takes place**, including a detailed management plan prioritizing protection as required by and in consistency with [Toronto Official Plan Office Consolidation February 2019 Chapter 3,4 Natural Environment](#) and in the context of [High Park – Terrestrial Biological Inventory](#) and [Natural Heritage Impact Study, Bloor West Village Avenue Study, May 2018](#), studies recommendations for management of public use and to mitigate increase of use due to population growth, the adjacent development and evaluate properly the implications of any changes proposed along HPMS on protected features and ecological function. **Impact Study** needs to accompany HPMS in the absence of the Master Plan.

3. **Car free High Park in a long term can be only realized as a part of a plan (Master Plan) dealing fully with complex issues, while prioritizing protection lenses when making decisions on preferred strategy.**

Pursuing biodiversity goal and implementing protection policies adopted is absolutely critical in High Park. Failure to prioritize natural environment, if HPMS pursued as now planned, may accelerate "*death by a thousand cuts*" to protected nature and the species by ignoring impacts and promotion of sport/recreational cycling, more intense use, more concrete physical barriers for wildlife connectivity, more fragmentation and disturbance via place-making, plaza, etc. more intrusion of main street urban design and commercializing into what many see as nature refuge amidst the big city.

High Park is Toronto's equivalent of the Greenbelt

Not too many people know that "*By way of comparison, the high-quality Albion Hills Conservation Area on the Oak Ridges Moraine is almost three-and-a-half times the size of High Park but has only 29.3 ha of L1-L3 communities, 6% of the area of the conservation area. High Park has by far the largest area of remaining oak woodland, savannah and prairie communities in the TRCA jurisdiction. Other than High Park, they are scattered elsewhere in the Humber Plains (Lambton Park (TRCA 2016) and South Humber Park), with tiny patches in the southern part of Rouge National Urban Park and on the Oak Ridges Moraine in the East Duffins Headwaters (TRCA 2010). All of these communities are considered provincially-significant and globally-rare, with only about 3% of the original area remaining in Ontario*" [TRCA-HighPark-TerrestrialBiologicalInventory:high-ranking vegetation communities,pg.24](#)

High Park has more flora diversity than Albion Hills, while it also provides for Significant Wildlife Habitat regarding species on at Risk List (all native turtles) [TRCA-HighPark-TerrestrialBiologicalInventory_fauna of special concern](#).

High Park is one of the three Environmentally Significant Areas, along Toronto's waterfront "*notable as area for migrant songbirds: 20% of migrant songbird records are from High Park (Dougan and NSE 2010)*". It is crucial to support bird migration as recent report [State of the World's Birds](#) paints a bleak picture speaking of tipping points.

"The City of Toronto is an annual stopover location for thousands of migratory birds. Seasonal migration is a critical component of many birds' life cycles in North America, and elsewhere, and yet this phenomenon is often overlooked as an important consideration in habitat and wildlife conservation initiatives. The diversity and abundance of birds that continue to migrate through Toronto means that the City has both an opportunity and a responsibility to support the safe passage of these birds..."

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 Thompson Park and High Park together account for more than 70% of the TOC's migrant bird records for the period between 1990 and 2007." [City of Toronto, Migratory Birds in the City of Toronto, A Literature Review & Data Assessment](#)

Despite of rhetoric, IE3.7-HPMS-Final Report and [Preferred Strategy](#) ignore what [High Park – Terrestrial Biological Inventory](#) points out as main threats to High Park: too intense, out of control, non-compatible public use, trampling. Bicycling poses threat to "*all five of the herpetofauna species of concern and five of the seven mammal species of concern*" [TRCA-HighPark-Terrestrial Biological Inventory_Fauna sensitivity,connectivity,no bikes on trails, Bicycle lanes_TO cycling routes](#).

"The 161 ha High Park is located entirely within the urban landscape and consists of a combination of ravines, tableland, and ponds. Natural cover at this site is dominated by a combination of provincially-significant oak woodland and savannah; several types of forest, and small areas of wetland. As such it is a valuable contributor to the natural heritage system and biodiversity of the region. The site has the potential to maintain healthy populations of many flora and fauna Species of Regional and Urban Concern, and overall regional biodiversity. The extent to which this potential is realized is dependent upon the strategies used to manage public use, protect the integrity of the habitats that exist, and restore degraded or invaded habitats" [High Park – Terrestrial Biological Inventory](#)

Yours sincerely,

Lenka Holubec,_member [ProtectNatureTO](#) and [HighParkNature](#)