

**IE3.7 Infrastructure and Environment Committee consideration on April 26, 2023\_ High Park Movement Strategy - Final Report submission Lenka Holubec**

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**RE: IE3.7 Infrastructure and Environment Committee consideration on April 26, 2023\_ High Park Movement Strategy - Final Report**

Dear Chair Jennifer McKelvie , Vice Chair Councillor Mike Colle and Councillors,

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

As a member of the High Park Natural Environment Committee and ProtectNatureTO, I have participated in all HPMS External Stakeholders Sessions.

1. I fully support [Letter from Karen Yukich & Leslie Gooding, Co-Chairs, High Park Natural Environment Committee \(IE.Supp\)](#) and **Proposed Measures and Reallocation of Funding** as stated.
2. **Additionally, I strongly recommend that HPMS should not be concluded 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](#), [Natural Heritage Impact Study](#), [Bloor West Village Avenue Study, May 2018](#) etc. studies recommendations for public use to 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.

**Potential negative impacts resulting from HPMS** may include site alteration, more intense use, non-compatible use, uncontrolled recreational activities, habitat fragmentation, trampling, disturbance/harm to wildlife, wildlife connectivity changes/ loss, undermining of ecological functions, degradation, biodiversity loss.

**HPMS as proposed is not consistent with the City OP.** Proposed promotion of recreational cycling, including dedicated speed cycling pilot in early morning hours has nothing to do with safety or necessary infrastructure. HPMS also proposes dedicated cycling by-pass route north of Grenadier Café.

Making decisions on the options presented by HPMS, in the absence of the Master Plan (ecologists, protection policy advisors), places the onus of evaluation of how these options will work for nature on HPMS.

**“Safety for nature” needs to be prioritized in protected natural heritage, the ESA/ANSI/PSWs, over other public use** not just to make HPMS consistent with the city adopted protection requirements but to allow conservation of natural features and protected ecological function to take place. **Prioritizing of protection where the ESA/ANSI is concerned is mandatory, not optional.**

Simply put, our demands on protected natural areas and sensitive wildlife habitats cannot override “safety” for protected nature or soon there will be little nature left in terms of urban biodiversity hot-spots for us to derive precious benefits.

Stated purpose of HPMS is: “The goal of the High Park Movement Strategy (HPMS) is to better serve park users and the surrounding community, **while prioritizing improvements to safety, accessibility and the park’s natural environment.**”

**Unfortunately, Preferred Strategy as presented this past February and as developed in High Park Movement Strategy - Final Report fails to prioritize what is most valuable about High Park - protected natural environment while even pedestrian safety and enjoyment of nature are not addressed as needed.** Preferred Strategy formalizes pedestrian’s High Park experience by transforming a casual walk in nature into manicured, main-street style walk without much added safety.

All recent findings confirm that real nature, not just turf grass manicured parks are increasingly desirable and rare in our growing city. Nature now can be prescribed by Ontario doctors: “*Experiencing wildness is particularly important for physical and mental health, according to a new study on urban parks*” [Wildness in parks can make you feel better.](#)

Introduction of main-street urban design (a complete street together with median), plaza, cutting through ANSI (site alteration) to enhance cycling use, place making, etc. are moving HPMS into public realm and Master Plan territory but in the absence of the overview by ecological consulting as would be a part of Master Plan or Impact Study.

**Increasingly, it seems HPMS is to address a vocal group/s calling for “car free” High Park supporting their demands by TransformTO, VisionZero, ActiveTO, etc. rhetoric.**

These otherwise relevant goals may distract attention from the fact that High Park above all is one of the most significant and protected biodiversity hotspots in this city and beyond. Its unique nature, flora and fauna, is in a dire need to address the real threats to its “safety” and ecological health/biodiversity. **These threats are not cars but neglect and our activities – public use as indicated over and over in findings of relevant reports and studies done for High Park.** These studies are urging the city to mitigate increased public use due to the growth and manage public use to prioritize protection, as mandated by the City OP, to increase resiliency and support biodiversity from rapid decline before it is too late.

Worth mentioning here is that behind this big push for “car free High Park” are also many cycling enthusiasts who would love to see their interest in sport cycling to become an official pilot in High Park - [Mornings in High Park could belong to cyclists under a new city proposal](#)

Cycling lobby group fails to recognize non-compatibility of sport cycling with High Park protected ecological features and functions. As other big interest groups, cyclists don’t see impacts of their own activities affecting High Park’s fragile nature and biodiversity while demanding more use.

Biodiversity is in a severe decline locally and globally. The city adopted policy goals not only 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.”**

Pursuing biodiversity goal and implementing protection policies adopted is absolutely critical in High Park/ESA/ANSI/PSW. **Failure to prioritize natural environment by HPMS may just make this Strategy, if pursued as now planned, a vehicle to weaponize “death by a thousand cuts” to protected nature** by ignoring impacts of sport 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, while this is only home for the species provided by High Park.

Since High Park is so significant biodiversity hotspot, it is much more critical and relevant and it makes also more sense to relocate funding from HPMS to restoring and protecting biodiversity.

## High Park would be an excellent candidate for 30X30! Near-urban Protected Areas in the Greater Golden Horseshoe Now Count Towards Canada's Target

High Park has got it all and more to qualify, while the challenge to implement the city's already adopted protection laws could serve well to move Toronto towards its own goals and biodiversity.

[Big cities have a major role to play in protecting biodiversity, experts say](#)

***“While they're traditionally viewed as concrete jungles rather than natural oases, cities are increasingly taking a leadership role when it comes to protecting biodiversity.”***

Since High Park is so well loved and used, there is an exciting opportunity for all of us having to accept that our demands on this fragile nature resource need to be LESS NOT MORE.

Yours sincerely,

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

### Background:

[Toronto Official Plan Office Consolidation February 2019 Chapter 3,4 Natural Environment](#)

“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*.”

Comments on [High Park Movement Strategy - Final Report](#)

*“The preferred strategy would take bold, immediate-term actions to improve the travel network in High Park. The proposed changes acknowledge High Park's designation as a legacy park through **the City's Parkland Strategy**, serving as both a local amenity and regional outdoor destination and respond to the mobility needs presented by the many different activities and park user groups it supports.”*

[Final Parkland Strategy Full Report](#)

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Toronto's largest parks, **city-wide and legacy parks**, are typically the outcome of a unique era or major city-building initiative that resulted in a rare and significant park investment that attracts visitors from across Toronto.

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**The parks within Toronto's vast ravine system provide a unique function and experience, primarily passive recreation and ecological services.**

However, ravine parks are also more difficult to reach safely because of limited access points due to topography and natural cover. **While some parks located within Toronto's ravines (such as High Park, Earl Bales, and Sunnybrook parks) are accessible by foot, public transit, and car, and include a vast range of amenities and programming, these amenities are not typically found in ravine parks.** To assess a more locally-oriented parkland provision, a secondary analysis was conducted, where all parks within ravines (as defined by the City's Ravine and Natural Feature Protection By-Law limit) and **Environmentally Significant Areas were removed from the park supply data.** Figure 10 illustrates that 69% of total park area is removed from the city, reducing parkland per person from 28 m<sup>2</sup> to 8.7 m<sup>2</sup>. **It is important to consider provision both with and without ravines, to better inform parks planning and where there may be gaps in programming and functionality.**

## High Park Movement Strategy - Final Report

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*“Transportation is a major contributor to local greenhouse gas emissions in Toronto. Reducing motor vehicle trips and increasing modal shift to active transportation and transit is crucial to achieve net zero. The High Park Movement Strategy supports the City's transportation targets for net zero and takes immediate actions to encourage visitors to access the park by walking, cycling, or taking transit.”*

My comment: “Emissions (2021) come from: **buildings (44%), transportation (31%),** industry (20%), waste (4%), and agriculture (1%)” <https://taf.ca/carbon-emissions-increased-in-all-regions-of-the-greater-toronto-and-hamilton-area/>

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*“The preferred strategy provides immediate and ongoing accommodations for a range of physiological barriers, with an emphasis on infrastructure to support vulnerable road users as all park visitors are at some point a pedestrian.”*

**No evaluation done on wildlife connectivity** and how introduction of a range of “physiological barriers” may negatively wildlife. Protected natural areas with presence of mammals, reptiles, etc. wildlife are not suitable for urban design of “complete streets”. Calming measures not affecting connectivity should be implemented. Safety of visitors is important but prioritized in the ESA/ANSI is nature.

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### Reports and Studies on High Park:

#### [High Park – Terrestrial Biological Inventory](#)

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“Sensitivity to patch isolation considers the overall response of fauna species to fragmentation and isolation of habitat patches from one another. **One underlying consideration is the physical ability, or the predisposition, of a species to move about within the landscape and how this ability is affected by the connectivity of habitat. A second is the potential impact that roads and other habitat breaks have on fauna species that need to be mobile.** Bird species generally score lower than herpetofauna for the latter consideration (although they do forage and move along connecting corridors). Most herpetofauna score very highly because their life cycles require them to move between different habitat types; their mobility exposes them to impacts, most often road-kill. At the population level, birds too will be affected if the need for adult birds to forage for food during the nestling and fledgling stage of the breeding season is not provided for. By maintaining and improving the connectivity of natural cover within the landscape (e.g. by reforestation of intervening lands) we are able to positively influence the populations of such species, improving their foraging and dispersal potential”

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“Most of the mobility restricted fauna species at the Study Area are relatively small-bodied animals; their life cycle requirements may be satisfied within the confines of High Park. **However, for coyote (*Canis latrans*), red fox (*Vulpes vulpes*) and other larger mammals, home ranges may not be contained within the Study Area boundaries, and young mammals also need to disperse from natal areas. As individuals move back and forth across the landscape, they have to contend with the roads surrounding and intersecting the site. In any such urban landscape the habitat within the natural spaces becomes more critical to regional biodiversity. If connectivity between such natural spaces can be maintained or improved the potential for persistence of these species will be enhanced.”**

pg. 52 5.0 Summary and Recommendations

*"The site has the potential to maintain healthy populations of many flora and fauna Species of Regional and Urban Concern (minus ground- to low-nesting breeding bird species), 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.**"*

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"The main disturbances affecting High Park at present are intensive trampling from park visitors and off-leash dogs in upland habitats

"The abundance of dogs-off leash found outside the fenced in dog park at Dog Hill may be contributing to the lack of ground nesting birds."

"Intensification and infill development of the neighbourhoods around High Park is anticipated. It is a desirable location. **This could exacerbate the user pressures on this already heavily visited park, unless there is careful planning.**"

**"Uncontrolled recreational activities present a risk to the quality of the habitat in High Park."**

**"High participation rates increase the negative effects on habitats and species"**

"All five of the herpetofauna species of concern and five of the seven mammal species of concern score highly for patch isolation sensitivity. Common snapping turtle (Figure 15), midland painted turtle, American toad and eastern gartersnake undergo annual migrations to and from either terrestrial nesting areas with suitable substrate (for both turtles), breeding wetlands (for the toads) or communal hibernacula (for the snakes). **As long as traffic on trails within the Study Area is not too high and restricted to foot traffic only (no bikes), these species are less likely to be impacted. However, heavy visitation to the area increases the threat of predation and/or disturbance by off-leash dogs. Trails with bike traffic or off-leash dogs may result in herpetofauna and small mammal fatalities** (Burgin and Hardiman 2012; Weston and Stankowich 2014)."

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**In the longer term, efforts could be made to improve habitat connectivity across High Park, and between High Park and other natural areas.** The most obvious linkage is south to the Lake Ontario waterfront, where the transportation infrastructure presents a formidable barrier but also where sizeable patches of natural habitat remain both north and south of the barrier."

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[List of references to off leash dogs impacts in High Park – Terrestrial Biological Inventory, TRCA, 2019.pdf](#)

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[Natural Heritage Impact Study, Bloor West Village Avenue Study, May 2018](#)

[Bloor West Avenue Natural Heritage Impact Study: Addendum #1](#)

"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.

In order to effectively mitigate these impacts the City, in collaboration with TRCA, must protect and improve habitats in High Park in order to increase the resilience of existing ecosystems and **encourage behaviors that will minimize impacts in sensitive features and functions**

Recommendations to mitigate the impacts of increased use of High Park through inventory, management, and enhancement work in High Park are provided in Section 7.3 and Appendix 5 of the BWVA NHIS"

- Canada made a commitment to protection which is now highlighted by Canada participation in 30/30 COP 15 conference.