

**IE17.4 - Parkside Drive Study Final Report - Infrastructure and Environment Committee on October 22, 2024 Lenka Holubec submission**

October 22, 2024

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**RE: IE17.4 - Parkside Drive Study Final Report - Infrastructure and Environment Committee on October 22, 2024**

Dear members of the Infrastructure and Environment Committee,

Thank you for an opportunity to comment on the **IE17.4 - Parkside Drive Study Final Report**.

This to support the road safety project on Parkside Drive, including bike lanes, speed limits and traffic calming measures, while at the same time asking to ensure safety of residing wildlife which is critical to support biodiversity in some of the most significant natural heritage areas in Toronto, High Park, designated as the ESA/ANSI (the Environmentally Significant Area and the Area of Natural and Scientific Interest).

The city's natural heritage is under immense pressures which is being fully recognized along [Our Plan Toronto: Final Environment and Climate Change Official Plan Policy Updates](#) focusing equally on "Net Zero and Climate Change Mitigation" (TransformTO) and the leading-edge policies that are to protect the natural environment, support and enhance biodiversity under "**Resilience and Adaptation**" (please, see Background).

Protection vision utilized in time of designating of the ESAs (2012), clearly shifted from creating the "*islands of green*" approach towards "*more of a focus on systems planning and connectivity.*" (please, see Background for ENVIRONMENTALLY SIGNIFICANT AREAS (ESAS) IN THE CITY OF TORONTO, JUNE 2012, PREPARED FOR TORONTO CITY PLANNING).

In context of IE17.4 - Parkside Drive Study Final Report, this means to incorporate wildlife connectivity corridors into design supporting safety for pedestrians and bicyclists.

Connectivity corridors for wildlife are not a "nice to have" but essential for continued survival of fauna within densely developed urban areas such as High Park's vicinity.

Yours sincerely,

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

**Background:**

<https://www.toronto.ca/legdocs/mmis/2024/ie/bgrd/backgroundfile-249378.pdf>

“Staff are seeking City Council endorsement of, in principle, **two-way cycle tracks on the west side of Parkside Drive between Bloor Street West and Lake Shore Boulevard West**, with the provision of full-time parking and loading opportunities on the east side where feasible. Cycle tracks would improve the comfort and safety of all road users, particularly people cycling and pedestrians.”

**Rendering of two-way cycle tracks on the west side of Parkside Drive between Bloor Street West and Lake Shore Boulevard West”**

<https://www.toronto.ca/wp-content/uploads/2023/12/9414-ParksideDrivePanelsAODA.pdf>

## Quick Build Transformation of Parkside Drive



Conceptual rendering of potential changes on Parkside Drive

A quick-build transformation of Parkside Drive is a candidate for the Cycling Network Plan (2025-2027 Near-Term Program) which is expected to be reported to City Council for decision and direction in mid- to late-2024.

Key features:

- Two-way cycle tracks on the west side of Parkside Drive adjacent to High Park
- Curb lane car parking on east side and potential reduction in parking capacity
- Raised bus/bike platforms at west side, TTC bus stops
- Designated left-turn lanes
- No change to sidewalks



Note: Lane widths would adhere to the City's Lane Width Design Guidelines (Road Engineering Design Guidelines).

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**My comment:**

Bikeway cycle tracks constructed on the roads adjacent to natural parks and wildlife habitats potentially represent increased risk of harm/fatalities for wildlife when these attempt to cross the road. Concrete blocks separating bikeways from the rest of road present an added physical obstacle. Any structure may pose as visual barriers. This is significant for smaller mammals and reptiles. It slows this fauna down and obscures visibility, increasing chances of getting in harm's way.

**ENVIRONMENTALLY SIGNIFICANT AREAS (ESAS) IN THE CITY OF TORONTO, JUNE 2012, PREPARED FOR TORONTO CITY PLANNING**

"In the 1980's and 1990's, the focus of natural heritage planning in southern Ontario, and elsewhere, was on protection of areas considered ecologically unique and/or sensitive in an increasingly urbanized landscape, sometimes referred to as the "islands of green" approach. Over 1990's and into the 21st century, the science and practice of natural heritage planning has shifted away from the "islands of green" approach towards more of a focus on systems planning and connectivity".

<https://www.researchgate.net/publication/316256779> Environmentally Significant Areas ESAs in the city of Toronto

## **OPA 528** [Our Plan Toronto: Final Environment and Climate Change Official Plan Policy Updates](#)

The City of Toronto has a strong legacy of introducing leading-edge policies that protect the natural environment, support and enhance biodiversity, and address climate change.

Addressing the dual crisis of climate change and biodiversity decline, along with other environmental concerns extend beyond this Official Plan update.

### **Resilience and Adaptation, pg. 11/12**

Resilience to environmental stressors and adaptation to a changing climate is addressed throughout the Official Plan with new additions and refinements presented in Attachment 1. Updates within this theme area that were presented to Planning and Housing Committee on March 25, 2022

#### **Updates related to resilience and adaptation, pg.**

- Identification of a Water Resources System, including key hydrologic features and key hydrologic areas (Maps 9A, 9B, and 9C in Attachment 3), where Map 9 is relabelled as Map 9A and Maps 9B and 9C being new maps;
- Expanded the natural heritage system (Map 9A) to include water resource features and ravine and natural feature protected areas and to add a contributing areas layer and explanatory sidebar (3.4 the Natural Environment);
- Added four new Environmentally Significant Areas (ESA), expanded the boundaries of two existing ESAs and added two new Provincially Significant Wetlands (Maps 12A and 12B in Attachment 4);
- Removed Conlin's Pond from the ESA designation as it is a storm water management facility necessary for water quality control purposes and hence cannot be managed for natural heritage protection and enhancement (Map 12A);
- Updated policy recognizing the need to ensure appropriate sized infrastructure to accommodate intense storm events (2.2 Structuring Growth in the City)
- **New policy encouraging development adjacent to the Natural Heritage System to provide natural landscaped surfaces that increase the ecological function and/or biodiversity (2.3.1 Healthy Neighbourhoods)**
- **New policy in to minimize hazards to local and migratory birds (3.4 The Natural Environment);**
- Updated policies to enhance the urban forest and ensure adequate soil for new trees, protect mature and native trees, and support the health of street trees (3.4 The Natural Environment);
- Updates policy recognizing the risks associated with extreme heat (3.4 the Natural Environment), and recognizing the need for shade to ensure pedestrian comfort on City streets (3.1 The Built Environment);
- Updated policies promoting the integration of green infrastructure as a component of stormwater management (3.3 Building New Neighbourhoods, 3.4 The Natural Environment, 5.2.1 Secondary Plans);
- Updated non-policy text and added new sidebar text on the Natural Heritage System and Inventory integrating new water resources system mapping components; outlining the components of the Water Resources System; examining historical watercourses; and outlining watershed planning (Chapter 3);
- Updated non-policy text connecting the concepts of Green Infrastructure and Low Impact Development (Chapter 3);
- **Added a policy minimizing the use of road salt and its impact on the natural**

**ecosystem (3.4 The Natural Environment);**

- Refined policy to prioritize green infrastructure when protecting the health of natural ecosystems (3.4 The Natural Environment);
- **Refined policy to promote ecological and hydrological connectivity (3.4 The Natural Environment);**
- Refined non-policy text to integrate the tree canopy targets (3.4 The Natural Environment)
- **New policy encouraging development to demonstrate a net increase in ecological function on development sites within contributing areas identified on Map 9A (3.4 The Natural Environment);**
- Added reference to the Biodiversity Strategy within sidebar text (3.4 The Natural Environment); and
- New policy to consider Great Lakes Strategy, and Great Lakes Protection Act when undertaking watershed and /or waterfront planning (3.4 The Natural Environment)

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[Toronto Official Plan, CHAPTER THREE BUILDING A SUCCESSFUL CITYTORONTO, December 2023 Consolidation](#)

**“The natural heritage system is important to the City, both within and beyond our boundaries, and needs to be protected for the long term.”** CHAPTER THREE BUILDING A SUCCESSFUL CITYTORONTO OFFICIAL PLAN 3-43

**“Protecting Toronto’s natural environment and urban forest should not be compromised by growth, insensitivity to the needs of the environment, or neglect.** To this end, proposals for new development may need to be accompanied by a study assessing their impact on the natural environment.” CHAPTER THREE BUILDING A SUCCESSFUL CITYTORONTO OFFICIAL PLAN 3-44

**“Biodiversity** refers to the rich variety of life forms and the critical roles they play within varied ecosystems. Ecological health is related to healthy biodiversity. The greater the biodiversity of a defined geographic area, the greater the ecological health and resiliency of that area. **Policies protecting and enhancing the natural heritage system are a key pillar of biodiversity conservation within Toronto. The biodiversity found in small green spaces, street trees, green roofs, community gardens, hydro corridors, cemeteries, and backyards also play an important role in our urban ecosystem.**” CHAPTER THREE BUILDING A SUCCESSFUL CITYTORONTO OFFICIAL PLAN 3-45

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**[OPA 262](#) was approved by the Province in May 2016. The OPA is in full force and effect**

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.

### 3.2.3 PARKS AND OPEN SPACES 3-28

Our exceptional system of green spaces helps make Toronto a healthy and livable City. The City’s Green Space System, made up of parks and open spaces, the natural heritage system and a variety of privately managed but publicly accessible spaces, is an integral part of our quality of life and social well-being. It provides opportunities for recreation, relaxation and experiencing nature in peace and quiet and contributes to Toronto’s competitive advantage as a place to invest.

The Green Space System provides many benefits for the City. These lands:

-form the core of the City's natural ecosystems providing habitat for flora and fauna and including most of our significant natural heritage features and functions;

-help sustain our natural environment by cleaning the air, recharging groundwater, cleaning our watercourses and limiting damage that might arise from flooding and soil erosion;

-include natural and hydrological connections that link Lake Ontario to the larger biophysical region and its ecological systems;

-provide a variety of landscapes for reflection, contemplation and appreciation of nature;

-improve human health by offering opportunities for passive and active recreation, community gardens and environmental education;