

2024.IE18.10 Toronto Island's Environmentally Significant Areas - [Infrastructure and Environment Committee](#) on November 27, 2024 Lenka Holubec submission

November 27, 2024

Matthew Green

Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Email: iec@toronto.ca

Cc: councillor_colle8@toronto.ca; councillor_mckelvie@toronto.ca; Councillor_Morley@toronto.ca;
councillor_pasternak@toronto.ca; councillor_perruzza@toronto.ca; Councillor_Saxe@toronto.ca;

RE: IE18.10 - Toronto Island's Environmentally Significant Areas, Infrastructure and Environment Committee consideration on November 27, 2024

Dear members of the Infrastructure and Environment Committee,

Thank you for this opportunity to comment on IE18.10 - Toronto Island's Environmentally Significant Areas.

As a member of Community Advisory Committee for Toronto Island Park Master Plan, I have really appreciated this remarkable process. Now is time for this Plan to be realized to achieve tangible results to protect and restore Toronto Island's Environmentally Significant Areas and Provincially Significant Wetlands.

Report from the General Manager, Parks, Forestry and Recreation on Toronto Island's Environmentally Significant Areas <https://www.toronto.ca/legdocs/mmis/2024/ie/bgrd/backgroundfile-250669.pdf> stipulates:

"It is important to note that site-specific management plans are not required to undertake management activities in ESAs and the absence of a site-specific management plan for the ESAs on Toronto Island does not preclude ongoing natural area management."

Recommendation:

It is urgent to Determine and Designate where No Pets Policy will apply within Toronto Island's Environmentally Significant Areas and Provincially Significant Wetlands to reduce dogs related impacts on protected fauna and flora, especially migratory birds.

Toronto Island's Environmentally Significant Areas and PSWs significant ecological function was *designated* "as notable stopover area for migrant songbirds: 28% of migrant bird records are from the Toronto Islands" in [ENVIRONMENTALLY SIGNIFICANT AREAS \(ESAS\) IN THE CITY OF TORONTO JUNE 2012](#)

The importance of The City of Toronto as an annual stopover location for thousands of migratory birds and migration as a critical component of many birds' life cycles in North America has been established and recognized.

According to [Migratory birds of city of Toronto, 2009](#) A Literature Review & Data Assessment, FINAL REPORT August 2009 DOUGAN & ASSOCIATES

*“With the urbanization in eastern North American and southern Ontario on the rise, the cumulative impacts of the urban hazards (as described in Section 2.6) on many species of migratory birds are likely to increase and potentially impact species at a population level (Klem 1989; Sibley 2007; FLAP 2007). **In this context, the City of Toronto, and other places like it, have a responsibility to ensure that well-used migratory bird habitat is protected, that measures are undertaken to reduce threats to migratory birds, and that opportunities for habitat creation and enhancement are pursued to the greatest extent possible.**”*

...

“The Toronto Islands, Tommy Thompson Park and High Park together account for almost 68% of all the TOC’s migrant bird records for the entire 17 year period between 1990 and 2007.”

Yours sincerely,

[Lenka Holubec, member ProtectNatureTO](#)

Background:

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

Applies to designated natural areas, the ESA/ANSI/PSWs

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

[Toronto Municipal Code Chapter 608 Parks dogs prohibited areas](#)

§ 608-34.2 Dogs

PROHIBITED AREAS: [Added 2007-07-19 by By-law 790-200713]

A. Natural or environmentally sensitive areas (including designated ravines, wooded or savannah areas, sites of natural or scientific interest, areas which have undergone significant habitat restoration, wetlands or their buffer zones).

“The Global Invasive Species Database states that domestic dogs threaten a total of 200 IUCN Red List species. Thirty of these species are classed as critically endangered, 71 are listed as endangered, and 87 are listed as vulnerable. Dogs have contributed to the extinction of nearly one dozen wild bird and animal species”. **Pets as Invasive Species: Dogs**
<https://biodiversity.utexas.edu/news/features/pets-invasive-species-dogs>

Negative effects associated with the off leash dogs that are very significant - see [Impacts of dogs on wildlife and water quality](#)

Recent report [State of the World’s Birds comes with Invasive Alien Species List](#) is placing dogs at the top of chart together with cats as one of the leading cause of bird populations declines.

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

[High Park – Terrestrial Biological Inventory](#) includes about 20 references to dogs, such as:

“The main disturbances affecting High Park at present are intensive trampling from park visitors and off-leash dogs in upland habitats, and storm water runoff in the wetlands and riparian areas causing nutrient loading and flash flooding. Other threats include storm damage to forests that are lacking native regeneration, insect outbreaks, and invasive species.” Pg. 52/53

“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.” Pg. 53

<https://www.protectnatureto.org/dogs-in-natural-areas/>

[Dogs in Natural Areas](#)