

**IE27.7 - Ravine Strategy 2026 Implementation Update, Lenka Holubec, ProtectNatureTO**

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**Matthew Green**

Toronto City Hall  
100 Queen Street West

**VIA Email: Email:** [iec@toronto.ca](mailto:iec@toronto.ca)

Cc: [Councillor\\_Saxe@toronto.ca](mailto:Councillor_Saxe@toronto.ca); [councillor\\_fletcher@toronto.ca](mailto:councillor_fletcher@toronto.ca); [councillor\\_colle8@toronto.ca](mailto:councillor_colle8@toronto.ca);  
[Councillor\\_Morley@toronto.ca](mailto:Councillor_Morley@toronto.ca); [councillor\\_perruzza@toronto.ca](mailto:councillor_perruzza@toronto.ca); [councillor\\_pasternak@toronto.ca](mailto:councillor_pasternak@toronto.ca);  
[Councillor\\_ChernosLin@toronto.ca](mailto:Councillor_ChernosLin@toronto.ca); [joshua.wise@toronto.ca](mailto:joshua.wise@toronto.ca); [ivanamelsvoort@nseenvironmental.com](mailto:ivanamelsvoort@nseenvironmental.com);  
[kristen.vincent@toronto.ca](mailto:kristen.vincent@toronto.ca); [bonnie.williams@toronto.ca](mailto:bonnie.williams@toronto.ca); [clara.greig@toronto.ca](mailto:clara.greig@toronto.ca)

**RE: IE27.7 - Ravine Strategy 2026 Implementation Update**

Dear chair Paula Fletcher, Vice Chair Mike Colle and all members of the Infrastructure & Environment Committee,

Thank you for this opportunity to comment on 27.7 - Ravine Strategy 2026 Implementation Update.

These comments focus on “**City-wide ESA Management Plan and Framework**” included under [Ravine Strategy 2026 Implementation Update](#) Report, pg.10 “Environmentally Significant Areas”.

The short version of this document was published this past summer on the City ESAs webpage [Management Plan for Toronto’s Environmentally Significant Areas](#) and a full version of this document is also available: [FULL A MANAGEMENT PLAN FOR TORONTO’S ENVIRONMENTALLY SIGNIFICANT AREAS August 2025.pdf](#)

The ESA’s Management Plan was eagerly anticipated by nature protection community since the city of Toronto in 2015 adopted milestone [OPA 262](#), bringing environmental policies into the OP to conform to PPS 2014. It has designated 68 new and the expansion of 14 existing Environmentally Significant Areas (ESA). This OPA is now incorporated into the OP Chapter 3. Natural Environment Policies 3.4. Although this process has started much earlier, OPA 262 was critical. It is puzzling why this OPA is not being mentioned in [Management Plan for Toronto’s Environmentally Significant Areas](#) under “A BRIEF HISTORY OF ESA LAND CONSERVATION”.

## Recommendation:

**Refer the current Draft of Management Plan for Toronto’s Environmentally Significant Areas for further consultations to clear potential discrepancies, define and unify terms or remove some inefficiencies to ensure protection of the ESA’s for the long term.**

The consultation process regarding Management Plan for Toronto’s Environmentally Significant Areas was started in September 2022. It was discontinued in August 2024, while no official announcement of this or a finalized Draft of the Management Plan for Toronto’s Environmentally Significant Areas was circulated to the participants. Many, who have participated in the original consultations, only learnt about this document being published on the city ESAs website from other sources, which is not what is expected from the public participatory process.

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## On the merits of current Draft of Management Plan for Toronto’s Environmentally Significant Areas

Toronto Ravine Strategy is based on priority of the Protect principle as the first and foundational principle.

For the ESAs, the protection mandate is stronger, founded on the high level policy:

City OP Chapter 3.4 The Natural Environment, Policies 3.4.14

*"Development or site alterations with the exception of trails 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 will avoid these areas unless there is no reasonable alternative, adverse impacts are minimized and natural features and ecological functions are restored or enhanced where feasible."*

Toronto’s growing population and expanding demands for the ecosystem services may easily outpace and overwhelm the ESAs flora/fauna and fragile ecosystems

Recent emphasis on more use as the way to educate/connect with nature, enjoy ecosystem services for recreation, social equity, inclusion, etc. should to be considered along protected natural areas carrying capacity and monitored to prevent degradation.

### [Parks Plan 2013 -2017](#)

*"The ESAs - Heavy use and sustainability Rising population density and limited opportunities for parkland growth are resulting in more people using the City’s parkland. This is, for the most part, a positive trend that can be supported by adjusting maintenance practices and the design and distribution of park features and amenities. In some settings, however, overuse or misuse negatively affects the quality and sustainability of parkland. Natural areas are vulnerable to heavy use, as they have low ‘wear tolerance’ and natural ecosystems deteriorate relatively quickly under conditions of overuse.*

*Natural environments have a threshold (or “tipping point”) for disruption beyond which severe and possibly irreversible damage is done to ecological health. Knowing where thresholds exist and when they are reached is*

*important for understanding and managing the impacts of use. It allows for the development of early warning systems to identify at-risk locations so that timely action can protect them."*

### **How this Draft ensures Protection for the Long Term? What are the safeguards?**

There are many anticipated and good features along this version of [Management Plan for Toronto's Environmentally Significant Areas](#), while some need clarification or reconsideration.

### **COMPATIBLE ACTIVITIES AND USES**

The provided examples of compatible and sustainable ESA activities and uses may be too vague or controversial to serve as a guideline:

Activities and projects which serve to protect, restore and / or enhance ESA ecological features or functions and do not introduce harm or risk to the ESA or ESA users **Who will determine this?**

- Management interventions in response to exotic and / or invasive species, pathogens or disease **will use of nontoxic measures, such as biological control for phragmites given a chance?**
- Planned flood and erosion improvement projects, where deemed appropriate /necessary **Will public be consulted properly? Smythe Park in Toronto is currently at the center of a major controversy as residents and environmental advocates rally against a city-led flood mitigation project, dubbed the "Save Smythe Park" campaign**
- Teaching and knowledge sharing activities
- Planned trails and infrastructure and the maintenance thereof, where deemed appropriate **Will more trails/accessibility use be considered along compatibility with protected natural areas and ecosystems physical capacities to carry such use?**

Traditional Indigenous uses and activities such as placekeeping, ceremony, planting, and access to traditional foods and medicines can be suitable within ESAs. Through the Reconciliation Action Plan the City will continue to foster these types of opportunities and agreements

**Will these uses and activities be evaluated along the same criteria as for the general public?**

*"The city says foraging is also prohibited by the Toronto Parks Bylaw, Chapter 608.*

*There are also a number of ravines in the city have been designated as Environmentally Significant Areas. "Many plants that foragers collect grow in these sensitive habitats," the city says. "Trampling soft soils and other plants negatively affects ecosystems."*

[Foraging prohibited by Toronto bylaw, city warns, CTV Toronto, July 31, 2015](#)

## INCOMPATIBLE ACTIVITIES AND USES

Section lists many clear instances of harmful use. **The problem is a chronically lacking enforcement in Toronto parks, ravines and the ESAs where it hurts the most. An enormous problem is the off leash use in the ESAs, where ironically should be no dogs if the city was to follow its own laws:**

Municipal Code § 608-34 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).”*

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### Existing Incompatible Conditions or Uses

There is little immediate relief for the ESAs, where incompatible use/condition clearly undermine protected ecological function and/or natural features. *“Plans that will assess existing uses and determine if they should be maintained, modified or phased out “ removed.”* may be years in coming, regardless of damage done.

### Step 4 | Select Management Objectives, pg. 25 [FULL A MANAGEMENT PLAN FOR TORONTO’S ENVIRONMENTALLY SIGNIFICANT AREAS August 2025.pdf](#)

Listed among many other Examples of management objectives is:

***“Mitigating effects from a specific pressure or impact from adjacent areas”***

It is critical in Toronto under development pressures often targeting the locations in vicinity of ravines and protected natural heritage, that there is mitigation for the protected natural heritage affected by the proposal in adjacency. At this very time, the city seems no longer require the OP mandated Natural Heritage Impact Study (several recent proposals adjacent to High Park lack NHIS) to evaluate potential impacts (direct, indirect, cumulative) from development. The absence of NHIS, where mandated, is not in conformity with the OP. Nevertheless, when proposal approved, there will be indirect/cumulative impacts resulting from increased use, pets, incompatible use, that needs to be mitigated. So far, this legally mandated mitigation remains a big gap in Toronto along the proposals adjacent to protected natural heritage. This GAP should be addressed by existing management plans or by ad hoc intervention via reviewing agency directing the city staff to address mitigation triggered by NHIS.

### Prioritization Criteria, pg. 31

The Draft Management Plan for Toronto’s Environmentally Significant Areas (ESAs) Summary, August 2025 seeks to balance ecological protection with social equity by integrating both into its site prioritization

framework. While the plan is designed to support existing policies like OPA 262, it introduces a "Social Equity" lens that some observers may perceive as competing with purely ecological mandates.

Social Equity criteria considers "priority investment areas" and neighborhoods where the City is promoting social inclusion and improved access to greenspace.

The 2025 Draft is explicitly framed as a tool to support and improve existing ESA protective policies, rather than replace or diminish them.

The August 2025 Summary maintains that its foundational goal is to protect biodiversity. However, by elevating social equity to a core criterion for prioritizing which areas receive management attention first, it may move beyond a strictly biological approach.

Yours sincerely,

Lenka Holubec, member of [ProtectNatureTO](#)

[Good Choices, Bad Choices, 2017 Environmental Protection Report, Dianne Saxe, Environmental Commissioner](#)

***“6.1 What Is a Protected Area?***

*Protected areas include what we commonly refer to as parks. They are defined areas that are permanently set aside and managed to conserve nature – places where plants, animals and natural processes can exist without being negatively affected by human activities.*

*The IUCN defines a protected area as “a clearly defined geographical space, recognised, dedicated and managed, through legal or other effective means, to achieve the long term conservation of nature with associated ecosystem services and cultural values.”*