

RE: PE29.02 A Draft Biodiversity Strategy for Toronto, July 12, 2018

Thank you for this opportunity to comment on the Draft Biodiversity Strategy for Toronto. ProtectNatureTO is a coalition of over 20 nature- and stewardship-based organizations advocating for the protection of wildlife and natural areas across the City of Toronto.

We share the aim of the draft strategy to increase the quality and quantity of natural habitat within the City, and the vision of a Toronto where natural habitats are protected and where residents recognize that interactions with nature enrich their lives on a daily basis.

While we celebrate Toronto's natural areas and the remarkable biodiversity found here, we share the Strategy's concerns that nature faces many challenges here, including loss and fragmentation of habitat, discontinuities between patches of healthy habitat, loss of diversity due to invasive species, climate change, and the numerous impacts of human and pet use.

As highlighted in the Parks Plan 2013-17, "natural environments have a threshold (or tipping point) for disruption beyond which severe and possibly irreversible damage is done to ecological health". Unfortunately, some of our natural areas are at this tipping point.

Here are a few of our recommendations:

- 1) **Themes:** Protect should be added as a theme and precede Restore, Design and Engage. We recommend that the Strategy put more emphasis on slowing down or reversing degradation in order to preserve the ecological integrity of our ESAs and other high quality natural areas as healthy habitats.

- 2) **Environmentally Significant Areas (ESAs) and Connections:** Our best prospect for restoring healthy habitats and native biodiversity across Toronto is to focus on protection and restoration of the already-designated ESAs. (Currently, only 7 of the 86 ESAs have a plan in place.) As noted in the Strategy, common native species are the foundation of our local biodiversity and are key to maintaining ecological integrity. Developing and implementing management plans for our ESAs and the linkages between them will protect rarer species within them and remaining common species as well.
 - a) Establish a protocol to determine, for each ESA, current and future activities which are incompatible with the preservation of the natural features and ecological functions attributable to the areas, in accordance with Official Plan Policy 3.4.13. Ensure no City department undertakes work within the proximity of ESAs (i.e. 120 metres) without verifying the boundaries of ESAs and compliance with OP 3.4.13.
 - b) Include Transportation Services as a collaborator (Action 4) as many invasive species occupy space and expand along our main transportation routes.
 - c) Create and maintain connections/corridors for wildlife between natural areas (Actions 10, 11 and 12).

- d) Consult current stewards, experts, leaders and community groups who have been working for years on certain sites, in drawing up Management Plans for ESAs.
- e) Identify habitat for Species at Risk outside ESAs and maintain a database in order to ensure compliance with federal and provincial regulations

3) Community Stewardship Program:

- a) Expand the Community Stewardship Program and develop a volunteer protocol that will encourage participation by many citizens in biodiversity and the protection of natural habitats.
- b) Explore and implement other models of Stewardship, for example: Fletcher Wildlife Garden in Ottawa (<https://ofnc.ca/programs/fletcher-wildlife-garden>) and the Rockcliffe Park Residents Association (<http://www.rockcliffepark.ca>). Other examples are readily available. These models employ high standards and importantly, do not involve city funding, though some support is needed.

4) Art and Cultural Events: Develop guidelines for art events and other projects adjacent to or in natural areas (Actions 13, 14). Current documents do not take into account the ecological integrity of natural habitats and the biodiversity found there; instead attention is focused on manicured parks. (See Toronto Arts Council, Art Events in Toronto Parks, A Handbook for Arts Organizations, April 2011.)

5) Communication, Education and Outreach: Increase protection through effective signage and public awareness campaigns using a variety of media, supported by meaningful enforcement. Overuse of natural areas, new trends such as group food foraging in ravines, illegal dumping, intensified development adjacent to natural areas, encroachments, and other disruptions are challenging the carrying capacity of the areas, causing degradation, and must be controlled or restricted (Parks Plan 2013-2017 p.37 and 4.2 p. 38). Our natural areas are not merely 'empty space'! Many citizens do not realize that their activities are causing harm to natural areas and an educational outreach program could help to mitigate these problems.

- a) Improve communication and coordination internally between city departments and agencies regarding natural areas protection and clearly delineate responsibilities.
- b) Create a biodiversity page on the City's web site (Actions 16,17,18,19). Include an overview of biodiversity and why it is important, an overview of Toronto's significant biodiverse communities, and legal protections (laws, regulations, policies, plans, by-laws and guidelines). For each ESA, include an interpretive pamphlet, the technical report leading to its designation, the management plan, and the results of monitoring.

- 6) **Land Use and Planning Process:** Most importantly, develop a planning process that recognizes the legal protections for natural heritage, including biodiversity. The Provincial Policy Statement 2014 requires that “proponents of development demonstrate that there will be no negative impacts on the natural heritage, natural heritage features and ecological function”. Ontario’s Natural Heritage Reference Manual states that “regardless of the assessment undertaken, the level of detail must be sufficient to demonstrate that there will be no negative impacts on the natural features or their ecological functions”.

- 7) **Other Strategies:** The original recommendation to the Parks and Environment Committee in 2015 requested that “any international, national, provincial, or regional strategies for protecting biodiversity that might inform a Toronto biodiversity strategy be included”. We support the robust approaches outlined in the documents we have listed below and ask that these be consulted as the strategy is developed:

List of Documents

1. [Biodiversity Guide for the Greater Portland-Vancouver Region](#)

2. Ontario Nature Best Practices Guide to Natural Heritage Systems Planning:
<https://ontarionature.org/wp-content/uploads/2017/10/nhs-guide-web-1.pdf>

3. Ontario Greenbelt Alliance: [OGA Presentation-NHS-Ag-System-Water-System June-2017](#)

4. Society for Ecological Restoration, International Standards For The Practice Of Ecological Restoration – Including Principles and Key Concepts, First edition: December 2016
Tein McDonald, George D. Gann, Justin Jonson, Kingsley W. Dixon:
http://seraustralasia.com/wheel/image/SER_International_Standards.pdf

5. SER Primer: [The SER Primer on Ecological Restoration](#)

Thank you for this opportunity to comment on the draft Strategy. We look forward to participating in the consultation process.