



October 7, 2016

To: Janie Romoff, General Manager, PFR, City of Toronto

c.c. Donna Kovachis, Councillor Doucette, Green Toronto, Richard Ubbens, James Dann, Helen Sousa, Karinthia Battig

Re: Family Fishing Day and Fishing at Grenadier Pond

We are writing to request two changes to the City's fishing policies at High Park's Grenadier Pond:

1. That Grenadier Pond no longer be considered an eligible location for the Family Fishing Day event or any other group fishing event.
2. That serious consideration be given to eliminating fishing at Grenadier Pond altogether.

Rationale

Grenadier Pond is an important remnant of Toronto's once-extensive lakeshore marshes. The pond is home to special breeding species such as snapping turtle and wood duck and provides a valuable stopover point for migrating waterfowl.

Grenadier Pond is designated in two ways:

- as a provincially significant **Area of Natural and Scientific Interest (ANSI)** which "shall be protected for the long term", and
- as an **Environmentally Significant Area (ESA)** in Toronto's Official Plan which states that: "Activities will be limited to those that are compatible with the preservation of the natural features and ecological functions attributed to the areas."

We question whether fishing can be considered "compatible" at Grenadier Pond given the prevailing conditions, including:

- the scarcity of healthy aquatic habitats in the City
- the inherent risks fishing poses to wildlife, exacerbated by the unsupervised reckless behaviours of some anglers (e.g. discarded/lost fishing gear)
- the heavily vegetated character of Grenadier Pond, both along the shoreline and on and in the water, increasing the risks of snagged and broken lines
- the persistent nature of the hazardous materials generated by fishing, in and near the water
- the absence of any mechanism to monitor and modify the number of anglers and their behavior at any given time
- the need for constant supervision, sufficient enforcement and education to mitigate these risks which neither the City, other levels of government or fishing organizations seem to have the capacity to meet.

- the absence of efforts to revise existing regulations or enact new regulations, particularly in the urban context

Changes were made recently to try to lessen the impacts of fishing (see *Developments to Date* below). Nevertheless, **this recreational activity continues to pose a serious threat to wildlife:**

- Discarded fishing line is a continuing hazard in both fishing approved area and along the no-fishing shoreline. Please, see the attached support material.
- This hazard is made worse by the fact that favoured fishing spots are also attractive to wildlife for shore access, shelter and foraging. Fishing with live bait, corn and other food products and the public feeding of waterfowl also draw waterfowl to the hazardous fishing areas.
- Although initially reduced, fishing continues in the no-fishing area which is also a breeding area for wood ducks and other waterfowl.
- A considerable number of anglers fish in the evening or in off-limits places where they are hard to see.
- When informed of the fishing zone rules, some anglers claim to be unaware of them while others deliberately flout them. Deliberate non-compliance is a growing trend.
- Based on our interactions with the public, only a small proportion of anglers seem to be aware of the high risks posed for the wildlife and environment as a consequence of abandoned fishing line and other items.

Please see the attached **Factsheet** for a survey of **research information** related to the impacts of recreational fishing on wildlife and the environment. In addition, we recommend that you consult with bird/wildlife biologists and other experts not aligned with fishing-promoting organizations to gain more insight into the threats fishing poses to wildlife. Here are some of the relevant findings:

- Fishing gear (e.g., line, lures, hooks, lead weights) deposited along shorelines and water affects both the substrate in which it is deposited as well as wildlife present in the area.
- Lead has a slow dissolution rate and a high stability in sediment, leading to ingestion by waterfowl, which subsequently may suffer the effects of lead poisoning.
- Recreational shoreline angling activity may negatively impact littoral and riparian habitats independent of any direct or indirect influences of fish harvest or fishing mortality through mechanisms such as disturbance (e.g., trampling, erosion) and pollution (e.g., littering).

Family Fishing Day is designed to introduce urban youth to recreational fishing. To the extent that it is successful at making youth aware of fishing opportunities at Grenadier Pond, **FFD only serves to add more usage pressure**, both on and after the one-day event, to a fragile natural system that is already overloaded.

High Park is a high-profile, easily accessible location in the midst of an urbanized region of 3+ million people. At any time, anyone can decide to “try fishing” at Grenadier Pond. There is no standard of education, ethics or skill level and no limitation on the number of people who can engage in this activity a relatively small area which is already heavily used for other recreational purposes.

There is a long-standing tradition of fishing at Grenadier Pond, however the city's rapidly growing population presents enormous challenges in respect to the impacts on the natural areas. Other extractive activities such as foraging and hunting were also once common on public lands but are now recognized as no longer appropriate. Boating is also no longer permitted on Grenadier Pond.

There are many other ways to interact with nature that are not harmful. High Park is already well used by thousands of visitors of all ages to observe wildlife and appreciate the natural scenery, conduct nature study and scientific research, participate in interpretive walking tours, pursue photography, etc. Such activities could be further encouraged for urban youth as well as other residents and visitors.

Park users should be able enjoy observing waterfowl and other wildlife in a peaceful setting without finding them surrounded by and even entangled in life-threatening discarded fishing gear.

The availability of fish populations in Grenadier Pond is not a sufficient reason in itself to justify the continuation of fishing. Fishing by humans is not needed to maintain a healthy balance of aquatic life in the pond. If the City wishes to maintain and increase recreational fishing opportunities, there are other locations where this can be done, rather than using a precious resource that has been afforded a high level of protection (ANSI & ESA status).

Developments to Date

In December 2012, the document "Summary of Incidents to Wildlife at Grenadier Pond Related to Fishing: Conclusions and Recommendations" was forwarded to Richard Ubbens and others by Lenka Holubec on behalf of the High Park Natural Environment Committee.

Based on this report and various meetings, the City agreed to limit the fishing zone at Grenadier Pond to the southerly portion and posted various signs - see media release June 22, 2015, Changes to Grenadier Pond Permitted Fishing Area and Improved Wildlife Protection.

The City put the Family Fishing Day on rotation among several sites and it has not been held at Grenadier Pond since 2014. In 2016 it was held at Humber Bay and people there expressed concern about the impact on nesting grebes (see media reports in the Toronto Sun and on CBC TV news).

This year Grenadier Pond experienced a marked escalation of reckless fishing behaviour (fishing at restricted locations, discarded lines and hooks, littering with plastic, etc.) starting with the July 1st weekend, even without the Family Fishing Day event. This is also the week fishing is promoted across Ontario and no license is required. A series of reports submitted to 311 this summer provides detailed documentation of the extent of the misbehavior and the resulting harm to wildlife and unprecedented amount of abandoned fishing line and gear.

It should be noted that many injuries and deaths likely go unseen and/or unreported, and that public concerns related to fishing are also likely under-reported. Actual harm to the wildlife observed at the shoreline is likely only a fraction of the total wildlife affected. The amounts of discarded line and other fishing items are a better indicator of the imminent and long-term harm and damage to wildlife and the affected habitat. Please see attached Images file for photo documentation of fishing impacts.

Supervision and Education

Volunteers concerned about protecting wildlife and their habitat have made great efforts to collect discarded line and hooks. Park Operations staff have also been carrying out some shoreline clean-up. However, it would take constant supervision to try to address wildlife incidents such as ducklings tangled in fishing line. Furthermore, line and hooks caught in vegetation in the water or in overhanging trees can be very difficult or impossible to remove. These hazardous materials can persist in the environment for hundreds of years.

In addition to collecting discarded line, members of our committee and other concerned park users have tried to educate anglers by informing those who are in the no-fishing zone of this fact and showing them a copy of the posted City map that indicates where fishing is permitted. These volunteers may also mention other safety tips found on the signs and City fishing handout. They also check and empty the fishing line receptacles, check the fishing platform and shoreline for other harmful remains from fishing, and report or assist wildlife in distress. This informal volunteer-led attempt to educate anglers is not adequate to deal with the widespread prevalence of illegal and careless behaviour, the absence of angler education and the inadequacy of existing regulations.

Monitoring fishing behaviours to ensure compliance demands a level of attendance by by-law enforcement officers and conservation officers that is simply not available, despite their attempts to provide coverage of this area.

Conclusion

Holding a fishing promotion event at Grenadier Pond only encourages what is already very perilous unsupervised behavior, and would be counter-productive to the protection of this fragile resource. This type of event should no longer be permitted here.

As Toronto's growth puts increasing pressures on our remaining natural areas, it is difficult to justify maintaining and promoting fishing as a recreational activity, given its high risk to wildlife, and especially not within a protected area.

Declaring Grenadier Pond "fishing-free" would make this important wildlife habitat safer, allowing for increased biodiversity and abundance of all species. This would, in turn, enhance the park visitors' experience immensely as the majority of the public visit this area to enjoy the beautiful, peaceful view and to observe wildlife in a natural setting.

Thank you for considering this submission. We would welcome the opportunity to discuss this matter further with you and your staff.

Karen Yukich, Leslie Gooding and Lenka Holubec

High Park Natural Environment Committee

Encl. 1. Factsheet: Impacts of recreational fishing on wildlife and environment

2. Images: Impacts of recreational fishing on wildlife and environment at Grenadier Pond