



HighParkNature.org
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June 15, 2021

To: Chris Clarke

Cc: Councillor Gord Perks, Helen Sousa, Karinthia Battig, , Jennifer Gibb, James Dann

Re: High Park - Time to Revisit Fishing at Grenadier Pond

Thank you, Chris, for your prompt response and for your comments about enforcement and education. Unfortunately, your note does not address a number of key points at the heart of this matter. We would like to give you some background information to put our request in context.

1. **Who we are.** The High Park Natural Environment Committee (NEC), and its predecessor the Natural Environment Subcommittee of the High Park Citizens Advisory Group, has been active in protecting the natural environment in High Park for thirty years. We try to ensure our advice is always based on science and policy, and also our own extensive experience. We have maintained a productive and cooperative relationship with all relevant City departments and other agencies throughout this period, and have played a useful role in facilitating communication among these different bodies with respect to High Park.
2. **The ANSI includes ALL of Grenadier Pond.** Your comment suggests that only a portion of the pond is classified as ESA/ANSI ("PFR is not considering any further restriction of fishing at the Grenadier Pond beyond the ANSI and ESA areas"). In actual fact, all of Grenadier Pond and virtually all of the shoreline, including some shoreline where fishing is currently permitted, are included in the ANSI. Part of High Park was designated ANSI in 1989 (see [Varga report](#)), with an addition in 2008. Grenadier Pond in particular was cited "for harbouring one of only two remaining lakefront marshes in the City of Toronto, the other being the Humber River Marshes". In 2015 the City, through the municipal planning process, designated part of High Park as ESA (a smaller portion, including Grenadier Pond, was designated by the pre-amalgamation City of Toronto). The City's interactive map shows the designated areas. This map was not readily available when the fishing areas were discussed. (The ANSI map can be viewed [here](#) along with other support material compiled by Lenka Holubec, a member of our committee.)
3. **A healthy predator fish population is key to improving water quality.** A 1995 study of the water quality in Grenadier Pond (the [Gartner Lee study](#)) determined that excess phosphorus led to poor water quality and excess algal growth, as phosphorus is a plant fertilizer. One of the few available solutions (aside from stopping the feeding of geese) is to move the phosphorus up the food chain, and for that a healthy fish population structure is needed (lots of apex predators). The 1995 study recommended that the north end of the pond be reserved as a fish sanctuary but fishing be allowed elsewhere and the NEC followed these recommendations in our advice as to where fishing should be permitted. However, no one in 1995 anticipated the enormous fishing pressure that Grenadier Pond would subsequently endure. Rather than maintain a healthy fish

population structure, data collected sporadically over the years suggests Grenadier Pond has suffered an ecological collapse.

4. **The 2016 consultation meeting did not adequately address the long-term health of the pond.** At the 2016 meeting of stakeholders hosted by the City, representatives from the MNR (as it was then) were candid that their concern was at the watershed level. It is true that northern pike and largemouth bass are not scarce at the watershed level; however, with respect to the management of Grenadier Pond the watershed is the wrong scale. The City is required to protect the High Park ANSI for the long term, including Grenadier Pond. TRCA staff at the meeting were split between those with a mandate to promote fishing and those who had just surveyed the fish population of Grenadier Pond and were still somewhat shocked at the results, including the fact that they found no pike. It was already apparent that Grenadier Pond is too small to support angling pressure.
5. **Management of capacity is non-existent and not practical.** Your note does not speak at all to the issue of capacity. Extraordinary measures have been taken to manage and discourage crowds during the cherry blossom period. What measures will be taken to manage the onslaught of people coming to Grenadier Pond to fish, especially once the [Family Fishing Week](#) comes along to promote more fishing? How many staff will be assigned to manage the shoreline, and during what hours of the week and weekends? (We note that there is also a family fishing weekend coming up next weekend.) Judging by past experience, we can only expect even more hazardous, damaging and illegal behaviours this summer.
6. **Protection of species of concern must take priority.** Helen Sousa has been very helpful in a recent incident involving a snapping turtle's nest. This species can take up to 20 years to reach maturity and the survival rate of eggs and hatchlings is low. We have documented evidence of a mature snapping turtle killed by a fishing hook and have observed fishing practices that are either directly or indirectly aimed at harming this species. No doubt much more happens that is not seen and documented. That is just one example of the wildlife that need to be protected in this legally protected pond.
7. **Planning standards have become even more stringent.** The protection of natural areas and the conservation of features of scientific interest are identified as matters of provincial interest in the *Planning Act*. The Bloor West Village Avenue Study beginning 2017 triggers the requirement to show there is no negative impact, where negative impact is degradation that threatens the health and integrity of the natural feature (according to the Provincial Policy Statement, a document with which Council decisions must be consistent in respect of a planning matter). Additionally, it is during the phase of ensuring no negative impact that significant wildlife habitat is determined. In 2015 the province identified snapping turtle hibernation and nesting habitat as significant wildlife habitat that must be protected.
8. **Scientific studies and science-based guidance in support of fishing at this site are non-existent.** The Official Plan of the City of Toronto states that activities within ESAs will be limited to those that are compatible with the preservation of the natural features and ecological functions of the areas. The City has not developed criteria to determine which activities are compatible with protection in an ESA. The City has consulted people with a mandate to promote fishing and no one, to our knowledge, with expertise in ecological protection. We know of no evidence for and much evidence against the notion that fishing is a compatible activity in the High Park ESA.

NOTE: The Auditor General of Ontario's [Report](#) issued November 2020, Value-for-Money Audit: Conserving the Natural Environment with Protected Areas, cites a similar problem in provincial

parks: "With regard to existing protected areas, we found that the Environment Ministry did not collect sufficient information about species at risk, invasive species and the impact of activities like ... fishing ... that may harm native species in provincial parks and conservation reserves. As a result, the Ministry did not know enough about the state of biodiversity within existing protected areas to demonstrate that it is compliant with its legislative responsibility to conserve biodiversity in these areas."

9. **The compromise established in 2016/17 did not work.** The City and fishing supporters have had several years now to engage in education, mitigation and enforcement. All that has been done is the erection of some signage, some of which is now missing, and the placement of a couple of fishing line receptacles. At one point Helen Sousa had some bookmarks made up to use for education but these have not been distributed since the first season. The presence of bylaw officers is even less than before and seems more focused on activities such as late-night parties. MNR has fewer resources than ever and we have not heard of them making visits to the pond in recent years. Bylaw officers have told us repeatedly that a partial ban is harder to enforce than an outright ban.
10. **Long-established amenities and practices CAN be changed.** We understand that fishing is a long-established practice at Grenadier Pond. There are many examples of other long-established practices and amenities that have been changed in recognition of the significance of High Park's outstanding natural heritage. Extensive areas that were mowed for recreation use are now restored as oak savannah. Picnic areas have been decommissioned and restored to the point where they and the former recreation areas were added to the ESA map in the most recent review of the Official Plan. Many previously planted non-native trees, and even trees native to Ontario but not to this particular habitat, have been discreetly removed during the winter months to support the restoration of the park's continentally rare black oak savannah. Many years ago boat rentals were available at Grenadier Pond. Some people have asked for their return but fortunately the authorities realize that this would not be consistent with protection of the pond. What we can learn from these examples is that some changes may be unpopular with certain interest groups when they take place but longer-term objectives must be respected and take precedence. Certain decisions must be made based on long-term responsibilities, not just on current popularity among vocal interest groups. That is why the City operates within the framework of an Official Plan.

We would welcome the opportunity to discuss this matter with you in more depth. The threats to the long-term health of Grenadier Pond are too serious for the current situation to continue as is.

We also suggest that you seek input from the Planning Department (Jane Weninger) on the significance of the ANSI/ESA designations, from Municipal Licensing and Standards on practicalities of enforcement and staffing resources, and from scientific experts who are not connected to the promotion of fishing on the steps needed to ensure the long-term health of Grenadier Pond and the flora and wildlife it supports.

In the short term, it is imperative that steps be taken to head off the onslaught of fishing this summer as the park continues to bear the full force of COVID-19 generated crowds.

Thank you.

Karen Yukich & Leslie Gooding, Co-Chairs, High Park Natural Environment Committee