

## High Park Movement Strategy Stakeholder Response High Park Natural Environment Committee

Submitted by Leslie Gooding re January 31, 2024 External Stakeholder Consultation

*“High Park is one of the most significant natural areas in the Regions of York and Metropolitan Toronto, especially in terms of its vegetation communities and its rare flora. It is the last sizeable natural area remaining on Toronto's Iroquois Sand Plain.”*

--Steve Varga, A Botanical Inventory and Evaluation of the High Park Oak Woodlands  
Area of Natural and Scientific Interest, 1989

The High Park NEC believes it is premature to increase pressure on a natural area already suffering from overuse.

Based on the High Park Natural Environment Committee's knowledge of High Park's natural environment and the related City policies, High Park is not a suitable venue for an additional recreation activity. If a decision is none the less made to proceed with the pilot, we recommend that the timing of the planned public consultation should be delayed in order for the City to complete required studies and determine appropriate mitigation strategies in order to protect High Park's natural features and functions.

High Park has extremely high biodiversity for any area, let alone an area in the middle of Canada's biggest city, and is nominally protected by a number of City policies. Yet “the fine line between protection and use” (Parkland Strategy) has been crossed, as evidenced in the large number of adventitious trails (High Park: A Balancing Act, at approx. 34:18) and consequent loss of species—eleven rare native plant species have been lost in the twenty years pre-pandemic alone, mainly due to off-trail use (TRCA terrestrial inventory page 39). Pandemic social distancing was disastrous for High Park's ecological integrity because it increased rather than decreased the extent of adventitious trails. Increasing recreation pressure in High Park can be expected to increase the creation of ad hoc trails. The City has no program to ensure its strategies protecting sensitive areas (seventy per cent of the park) from incompatible activities remain current and effective. One of the goals of the HPMS in better serving park users was to prioritize the park's natural environment, but the knowledge gap is so great that the study team's environmental suggestions were destructive or trivial. Where the biodiversity is of such high quality as is found in High Park, the environmental imperative must be to protect it.

The HPMS proposed, for some future date, improvements to pedestrian infrastructure, rightly observing that the current sidewalks, frequently temporary asphalt paving with inclusion for posts for traffic signs and other obstructions, do not meet current standards. Widening the roads to allow for sidewalks 2.1 metres in width was recommended. However, given that the lower half of West Road and most of Centre Road are surrounded on both sides with exceedingly rare and critically imperilled plant communities (tallgrass prairie, savannah, and woodland), and are also TRCA regulated,

it is highly unlikely that any road widening is feasible and thus that any sidewalks will be built. Apart from the very significant exclusion of cars, safety and accessibility priorities for pedestrians, particularly those using mobility devices, will not be met. Although road closures were to be supported by improvements to pedestrian facilities, the HPMS did not report that the Park's very rich natural heritage conditions preclude road widening for the construction of conventional sidewalks. There is, however, a wide smooth surface with a gentle slope and good traction, namely Centre Road and the High Park Loop. Pedestrians should use this facility.

### *Answer the Question*

Nevertheless, the current request is to consider the Terms of Reference for high-speed cycling in High Park, informed by the parameters and principles of the April 12, 2023 High Park Movement Strategy Report.

One of the objectives of the pilot is to ensure safety for wildlife. Currently the wildlife whose safety might be compromised is not known, although there is speculation. For example, snapping turtles have been known to cross the road to reach a nesting site (The Saga of Mama Snapping Turtle, Children's Garden and Teaching Kitchen, c. 2015), and midland painted turtles use Centre Road (iNaturalist). Both are species at risk (Special Concern), subject to road kill. It's relatively well known what species are in High Park, but not necessarily how they use habitat. The pilot objectives include monitoring, but to undertake monitoring a baseline is needed. If such a baseline exists, it should form part of the Terms of Reference for monitoring. If not, as the first step in this pilot, a baseline of animal use should be determined, according to established scientific protocols but paying attention to desired training times. Since High Park is home to migratory and resident animals, data collection may need three seasons. This work would offer some assurance that the City actually is implementing its own natural heritage policies to ensure activities in ESAs are compatible with the preservation of ecological functions (half of West Road is ESA),<sup>1</sup> and the proposed recreation minimizes adverse impacts on natural features and functions (some of West Road is also Natural Area).<sup>2</sup> High speed cycling could not commence until this work is finished.

If a baseline is not established, together with any recognized mitigation, the precautionary principle applies. To protect wildlife, whose use of the cycling route is unknown, high-speed cycling should only occur during broad daylight AND there needs to be a protocol for the safety of any animals on the road during high-speed cycling.

- Broad daylight is "off-peak" for most animals. For those for whom it is not, such as snapping turtles and midland painted turtles, broad daylight allows marshals to see these species and ensure their safety (e.g. stop cyclists while the marshal carries the turtle in the direction it is travelling, or marks the location of a basking turtle so cyclists will avoid it).

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<sup>1</sup> Official Plan Policy 3.4.14

<sup>2</sup> Official Plan Policy 4.3.3

- Lights are not needed during broad daylight. High Park is a natural area, with multiple designations including approximately half of the West Road surface. Lights should be reduced in natural areas to minimize the expected negative impact of the proposed recreational intensification.

Roads in High Park were resurfaced in 2015 to accommodate a bicycle racing event, the intended venue of Toronto Island being underwater at the time. Because High Park's natural environment is so significant, this work was confined to the existing footprint. The pilot project proposal, to allow high speed cycling at some times but require slower speeds at other times is a partial prohibition to be enforced by by-law. High Park's previous experience with partial prohibitions enforced by by-law is that the prohibited behaviour expands throughout the facility (e.g. off-leash dogs are found outside the DOLA throughout the natural area, and fishing is common in Grenadier Pond's spawning grounds where no fishing is posted). Without the traffic calming measures proposed in the same sentence as the recreational pilot in the April 12, 2023 report, the repurposed High Park roads invite cyclists to speed. Vision Zero 2.0 concurs that design speed is more important on a (cyclist's) speed than a speed limit.

To protect human safety, as well as that of animals, by promoting compliance with speed by-laws outside scheduled high-speed bicycling hours, West Road should become a shared pedestrian-bicycle route, with pedestrians having right of way.

- For the safety of human road users, traffic calming measures should be in place in the cycling lanes at all times when supervised cycling is not occurring. This is consistent with the observations of Vision Zero: speed limits don't reduce speed, but traffic calming measures do. A cheap and convenient traffic calming measure that can be temporarily added or removed is pedestrian traffic.
- In the absence of a shared roadway, other traffic calming measures should be placed in the cycling lanes at all times outside scheduled training windows, when compliance with speed by-laws is desired.

#### Proposals for monitoring

- The effect on animal use, compared with the baseline
- Compliance with speed limits outside prescribed training hours, including any observed patterns
- Volunteer fatigue
- Displaced use e.g. are pedestrians displaced to informal trails (will need to have an established baseline here, too)
- Comments from the public

## Addenda

High Park's Environmentally Significant Area (ESA), from City of Toronto ESA study

The most common floristic theme for rare habitat in Toronto was prairie and savannah, reflecting Toronto's location as a significant remnant of the Iroquois Sand Plain. Prairies and savannahs are provincially rare plant communities, and many of the species found within these communities are also provincially rare. Forty-two of the qualifying species are those with affinities to prairie and savannah habitats (Riley 1989). These were found primarily on the Toronto Islands, in High Park and in Lambton Prairie, but also scattered on bluffs and south-facing slopes at some other sites. All species occurred at fewer than 10 sites, and many occurred only at High Park. (page 39, pdf page 49)

Presence of eastern red-backed salamander qualifies an area as an ESA (pp 42-43, pdf 52-53). Red-backed salamanders were found in High Park during field work for the Grenadier Pond Provincially Significant Wetland Complex report of 2022.

High Park is one of only 3 sites in Toronto with more than two reptile species—midland painted turtle, snapping turtle, DeKay's brownsnake & eastern garter snake. Presence of any turtle or snake qualifies site as ESA (pp 45-55, pdf 55-65)

Birds with breeding evidence

American woodcock (8 sites in Toronto), brown thrasher (10 sites in Toronto), wood duck (14 sites in Toronto), wood thrush (27 sites in Toronto), yellow-throated vireo (1 site in Toronto) (Appendix 5, pp 103-109, pdf 113-119)

*High Park Nature posts information about High Park, including technical material or links thereto on its website (<https://highparknature.org/>). See especially the resource section.*

*Selected Policies*

One of the results of the review of the parameters and principles in the April 12, 2023 report is that the City's strategies and policies do make provision for natural heritage protection.

*Ravine Strategy*

- High Park a priority site
- Since Ravine Strategy Objective is to protect first, criteria included ecological factors. First screening was rerun to weight ecology as most important.
- High Park scores high in: high density of ad hoc trails, restoration areas, high density of management sites (presumably ecological restoration), several types & location of restoration opportunities, interior forest, and habitat quality due to areas of high species abundance
- "The Priority Investment Areas will: prioritize additional studies and data collection to ensure any actions proposed work to first and foremost protect and/or enhance the ecology of these sites..."

There is no evidence of additional studies or data collection to ensure the cycling pilot protects or enhances High Park's ecology.

### *Parkland Strategy*

- High Park's type is natural, its function is ecological, and its size is legacy. The functions—ecological, sport and civic—are all important but not well-suited for every park, and can be better suited depending on the (function) classification of the park. (page 15)
- "Toronto's ravine system provides important wildlife habitat, and support biodiversity and climate change resiliency. The Official Plan identifies that these lands should be retained and preserved in a natural state. This allows for some compatible recreational programming, while ensuring adverse impacts on natural features and functions are minimized.... Additionally, Toronto's Ravine Strategy, in alignment with the Parkland Strategy, is critical to navigate the fine line between protection and use, and identify and prioritize the actions and investments needed." (page 19)
- "There is not one-sized fits all solution to preserving, building and supporting Toronto's parks system. A multi-faceted approach is needed to ensure that the parks system is sustained, renewed, and expanded in the face of growth and increased demand for parks." (page 39)
- High Park has one of the rarest collections of plant communities anywhere, and it also happens to be located on a subway line. In order to ensure that everyone in Toronto can visit, learn about it and appreciate it, it is necessary to ensure effective protection as a priority over other activities, desirable as they are. Fortunately, Toronto has the policies for the task, but they must be implemented.

*The natural environment is complex. It does not recognize boundaries and there are limits to the stresses resulting from human activity that it can absorb. To be good stewards of the natural environment we must acknowledge that it has no boundaries and we must respect its limits.*

--City of Toronto Official Plan, Chapter 3.4