



www.highparknature.org
mail@highparknature.org

April 13, 2017

To: James Dann, District Manager, Parks, PFR, City of Toronto <jdann@toronto.ca>

c.c. "Gord MacPherson" <gmacpherson@trca.on.ca>, "Donna Kovachis" <dkovach@toronto.ca>, Councillor Doucette, "Green Toronto" <greentoronto@toronto.ca>, "Richard Ubbens" <rubbens@toronto.ca>, "Helen Sousa" <hsousa@toronto.ca>, "Karinthia Battig" <kbattig@toronto.ca>

Re: Family Fishing Day & Fishing at Grenadier Pond

In our letter to Janie Romoff of October 7, 2016, we called for two changes in the City's policies at High Park's Grenadier Pond: to no longer holding group fishing events at this location, and to consider the elimination of fishing altogether. The response from Richard Ubbens dated October 25, 2016 (forwarded by Katarina Currah on December 20, 2016) states that:

"At this juncture, however, PFR is considering no further restriction of fishing at the Pond beyond the ANSI and ESA areas." and "This review does not include restricting special event permits at Grenadier Pond."

This response has left many concerns unaddressed. It also contains a serious misunderstanding with respect to the status of Grenadier Pond. Therefore we are writing again to request that this matter be fully studied and appropriately addressed.

The following is a list of key points, supported by more detailed references below. We would also urge you to review the contents of our original submission to Janie Romoff.

- a) The entire pond has protected status, both provincially and in the City's Official Plan. PFR has a legal obligation to ensure that the requirements of this protection are met.
- b) Population studies provided by TRCA indicate inadequate numbers of top predator fish, which threatens the health of the entire pond ecosystem.
- c) The pond is important for Wood Duck breeding habitat and as a stopover site for migratory birds, and supports relatively high reptile diversity.
- d) Damage to habitat and threats to wildlife due to fishing have been documented and continue to occur despite the restriction on fishing area and signage.
- e) As reported in The Living City Report Card 2016,¹ "...rapid population growth, continuing urban development and the impacts of a changing climate are placing tremendous pressure on the environmental health of our region..." This pressure highlights the need for prudent

management and greater protection of this scarce resource, a remnant wetland in the City's midst.

- f) There is no indication that any serious research has been conducted by the City or on its behalf by qualified independent experts to determine whether Grenadier Pond can support recreational fishing and to evaluate the long-term cumulative negative impacts on the pond's ecosystem, including top predator fish, waterfowl and reptiles. **Continuing fishing at GP without such a determination seems inconsistent with the policies safeguarding ESA/ANSI designated natural heritage.**
- g) The intent of the second sentence quoted above, regarding "restricting special event permits", is not clear. Does it mean that there has not yet been sufficient review to arrive at this decision? In any case, given the concerns about fish population structure and negative impacts on other wildlife and the City's responsibility to protect this sensitive habitat for the long term, **it would be inappropriate for the City to allow group fishing events that promote more activity at the pond, especially by inexperienced fishers.** While such events may have some educational value and perhaps can be conducted with greater safety at less sensitive sites, this small highly protected pond is not a suitable location for them to occur.

1. Protected status

Paragraph 4 of the Oct. 25 letter states: "...PFR is considering no further restriction of fishing at the Pond beyond the ANSI and ESA areas." This implies that some portion of the pond is NOT part of the ANSI or ESA areas, when in fact the entire pond has both types of protected status. Therefore, the City is currently allowing fishing within an area subject to Official Plan and Provincial designations. The Official Plan 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."

(The area currently marked "no fishing" was selected for this restriction as the area where most of the nesting and the greatest negative impact on waterfowl and other wildlife was observed. The prohibition of fishing in this area in no way implies that fishing is a suitable "compatible" activity at other parts of Grenadier Pond. Negative impacts on waterfowl and other wildlife have been observed and documented along the entire shoreline.)

The report *Environmentally Significant Areas (ESAs) in the City of Toronto, June 2012*² prepared for City Planning identifies that Grenadier Pond is important for Wood Duck breeding habitat and is considered a Provincial ANSI because it supports relatively high reptile diversity that is considered provincially or regionally significant (e.g. the snapping turtle). As noted in a City of Toronto staff report dated September 11, 2015³, "the alteration or destruction of wetland habitat can have a severe negative impact on Ontario's remaining turtle populations and shoreline disturbance can destroy nesting areas and terrestrial habitat adjacent to water bodies.

Evidence is required to determine whether any particular activity meets the criterion of being "compatible" for this protected habitat.⁴

2. Concerns re fish population structure

At the stakeholders meeting on September 27, 2016 TRCA staff said the most recent monitoring of Grenadier Pond (September 13, 2016) showed a poor fish population structure, with too few piscivorous (predator) fish (i.e. largemouth bass, yellow perch and northern pike), especially of reproductive age.⁵ Grenadier Pond is a small, enclosed pond in which fish live their entire lives. There has been concern that fishing pressure was too great to be sustainable since at least 1995 (Proposals for the Rehabilitation of Grenadier Pond, Wendigo Creek and Associated Wetlands, Gartner Lee Limited (June 1995))^{6,7}.

3. Inconsistent with Fishing Strategy

One of the objectives of the Fishing Strategy, *Fishing In Your Backyard: An Urban Recreational Fisheries Strategy for the Lake Ontario Northwest Waterfront*⁸ is to “identify the state and health of the fish communities and provide guidance for managing recreational fishing.” The Strategy further notes that “Although small numbers of Largemouth Bass, Yellow Perch and Northern Pike are present, the populations of these species are not large enough to sustain angling pressure.”⁹ (This comment is made with respect to coastal wetlands, but can apply equally to an enclosed pond.)

4. Inconsistent with Parks Plan

The Parks Plan 2013-2017 observes that “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.” This observation leads to the recommendation that “Parks, Forestry and Recreation will establish criteria to determine appropriate use and set measurable thresholds beyond which protection measures will come into effect.”¹⁰

5. Negative impacts on wildlife and habitat

Fishing practices have had a significant negative impact on the ecology of the entire pond and shoreline (aquatic habitat, wildlife habitat, long term degradation, by-catch, increasing organic content of water, "baiting") as documented by park users.¹¹ This is consistent with the results reported in research studies (please see the updated factsheet posted on our website).¹²

The partial restriction of permitted fishing area that came to effect in 2015 is not working. The impacts connected to fishing are negatively affecting the entire pond (abandoned fishing line, lead, etc.). The wildlife (turtles, water birds) use the entire shoreline and are attracted to the fishing permitted area, since most fishers use organic lure and "baiting".

The snapping turtle, listed as a species of special concern both federally and provincially and recently prohibited from hunting in Ontario, has been impacted by fishing at Grenadier Pond as it is a frequent by-catch and a much easier target for poaching during fishing season when many people are already engaged in fishing activities.

6. Inadequate enforcement and education

Enforcement and/or education sufficient to change the behaviour of a critical mass of fishers is a very involved, long term process which so far has not even been attempted. There is no new money for this education or enforcement. According to research and practical experience, educating recreational fishing user groups about responsible fishing practices is difficult and results are mixed.

All of these considerations point to the need for independent scientific studies to determine whether Grenadier Pond can support recreational fishing, and if so, under what conditions and at what level of activity. In general in determining whether to take action to protect the natural heritage, the precautionary principle applies. In the absence of sufficient scientific data indicating that recreational fishing can be conducted without negatively impacting the long-term health of the pond's ecosystem and significant species, **the prudent course is to suspend fishing at Grenadier Pond and to not approve any group fishing events for this location. We call on the City to take this prudent approach.**

Submitted by:

Leslie Gooding lesliegooding@bell.net

Lenka Holubec info@photosharedvisions.com

Karen Yukich karen@kryukich.on.ca

On behalf of the High Park Natural Environment Committee mail@highparknature.org

(Footnotes are attached)

Footnotes

1. *The Living City Report Card 2016*, TRCA, <https://trca.ca/wp-content/uploads/2017/02/3058-LCRC-2016-Final-WEB.pdf> page 3.
2. Environmentally Significant Areas (ESAs) in the City of Toronto, June 2012
https://www1.toronto.ca/City%20of%20Toronto/City%20Planning/Zoning%20&%20Environment/Files/pdf/ESA/esa_report_volume1_sept2012.pdf
3. www.toronto.ca/legdocs/mmis/2015/pe/bgrd/backgroundfile-83344.pdf page 8
4. Grenadier Pond in its entirety is designated part of the High Park Oak Woodlands Provincial Life Science ANIS (Area of Natural and Scientific Interest) and as such “shall be protected for the long term.” (Section 2.1 of the Provincial Policy Statement 2014, where “shall” indicates a positive direction, as opposed to “should,” “promote,” or “encourage,” which allow Council discretion). City Council has accepted this direction in including Grenadier Pond in its entirety in the ESA (Environmentally Significant Area) designation for High Park. As such, “Activities will be limited to those that are compatible with the preservation of the natural features and ecological functions attributed to the areas.” (Official Plan, Policy 3.4.13). It is a matter of fact (ie evidence is required) whether any particular activity meets this criterion.
5. Detailed population data is available from the TRCA.
6. Proposals for the Rehabilitation of Grenadier Pond, Wendigo Creek and Associated Wetlands, Gartner Lee Limited (June 1995), <http://www.highparknature.org/wiki/wiki.php?n=RestoreAndResearch.PolicyDocuments>, or copy in the High Park branch of the Toronto Public Library.
7. Fish Population Structure: Aquatic ecosystems are complex. Simply put, plant species provide energy through photosynthesis and plants are eaten by herbivores which in turn are eaten by predators. If there are too few predators to keep the population of herbivores in check, the entire ecosystem, including the plants, suffers. (The classic example is plants-deer-wolves. If there are too few wolves, the deer overgraze the plants, leading to loss of forest regeneration.) In Grenadier Pond, the top predators are mature largemouth bass, yellow perch, and pike. They prey on sunfish, which in turn prey on microscopic zooplankton, which consume phytoplankton. With too few predators, the sunfish overgraze the zooplankton, leading to excessive phytoplankton for ecosystem health. In addition, sunfish prey on bass nests, reducing reproductive success. (Gartner Lee, op. cit., pages 51 and 56). Pike and bass in particular are targeted by anglers. In the absence of fishing pressure, Grenadier Pond may be a self-sustaining ecosystem.
8. *Fishing In Your Backyard: An Urban Recreational Fisheries Strategy for the Lake Ontario Northwest Waterfront* http://aquatichabitat.ca/wp/wp-content/uploads/2016/06/URFS_June-20-2016.pdf, page 5
9. Ibid, page 7
10. Parks Plan, pages 37 and 38
11. Images: Impacts of recreational fishing on wildlife and environment at Grenadier Pond
http://www.highparknature.org/wiki/uploads/VolunteerOpportunities/Factsheet_Impacts%20of%20recreational%20fishing%20on%20wildlife%20and%20environment_oct7_16.pdf
12. Factsheet: Impacts of recreational fishing on wildlife and environment
http://www.highparknature.org/wiki/uploads/VolunteerOpportunities/Factsheet_Impacts_of_recreational_fishing_on_wildlife_and_environment_update_Apr12_17.pdf