



Official Plan Review
City Planning, Policy & Research
Metro Hall, 23rd Floor
City of Toronto
55 John Street
Toronto, Ontario, M5V 3C6

December 2, 2014

Comments on the Toronto Official Plan Draft Environmental Policies

CCFEW welcomes the many positive changes in the draft environmental policies in Toronto's official plan. We are particularly pleased with the consideration for migratory species, buffer zones and the dramatic increase in designated Environmentally Sensitive Areas. We have a few suggestions to make the policies even better.

First, as we recommended to the Planning and Growth Management Committee earlier this year, we strongly urge you to designate the Humber and Don River Valleys and Etobicoke Creek as Greenbelt Urban River Valleys rather than the less significant River Valley Connection designation indicated in the draft policy. Although the valleys are already protected in theory, this would add an extra layer, making it a little more difficult for “lets make a deal” development proposals and other variances. It also brings the Greenbelt into the City from the Eastern border to the West, reinforcing the importance of those natural systems to our city's environmental health.

It is very encouraging to see the increased number of Environmentally Sensitive Areas designated. Of particular interest to us is the one proposed at Colonel Samuel Smith Park. We support the recommendation of the Friends of Sam Smith Park to include two locations north of the waterfront trail: The Dogwood Thickets and the North Creek Woods. The park contains a remarkable diversity of habitats within a very small geographic area. It has become recognized as one of the most important migratory bird locations in Toronto. The [eBird database](#) shows records of 254 different bird species at the park, making it the third most important bird “hotspot” in Toronto behind Tommy Thompson Park and the Toronto Islands. The majority of the birds and bird species using the park are migrants, and most of the migrant songbirds are concentrated in the areas north of the currently proposed ESA. There is significant migratory bird habitat even further north in the park, but we hesitate to recommend ESA designation there because it is still our hope that Jackson Creek might eventually be daylighted in those areas.

The two recommended additions are illustrated on this map, produced by Friends of Sam Smith:

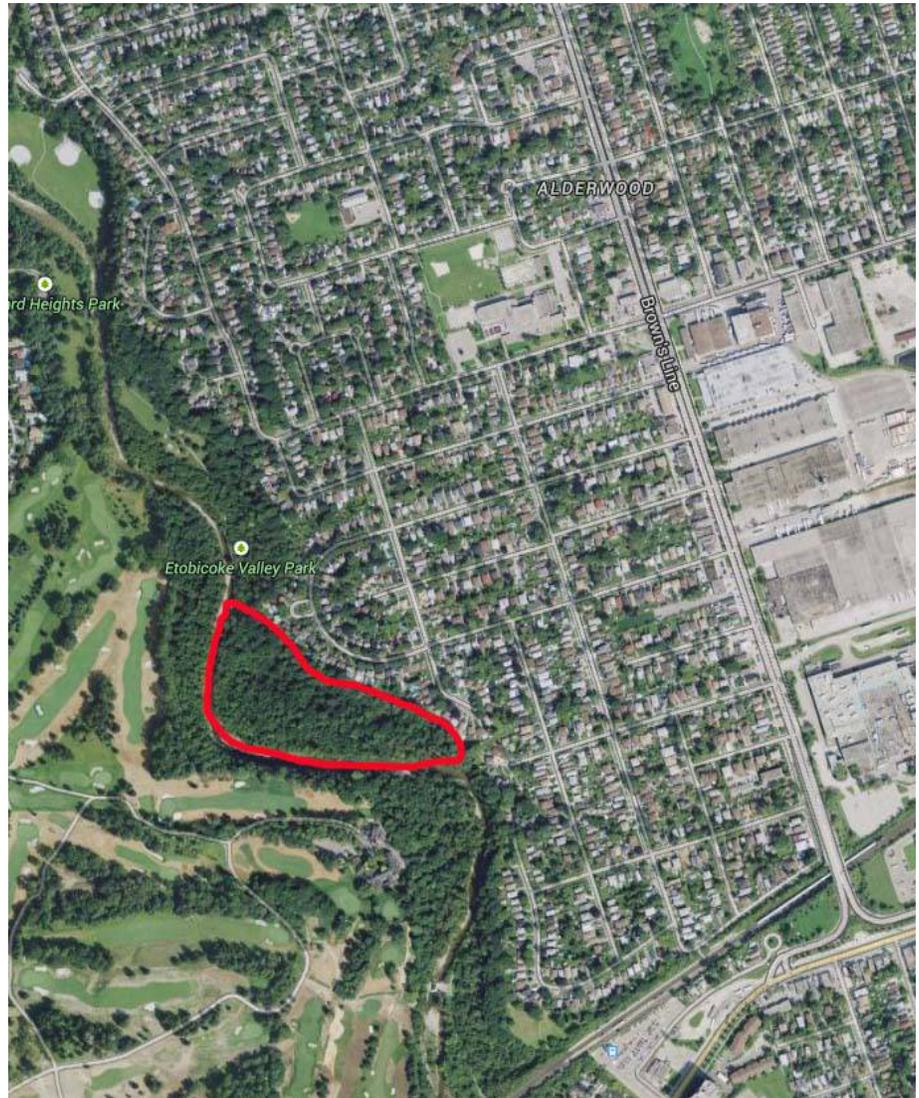


Another area we recommend for consideration as an ESA is the northeastern portion of Humber Bay Park East, outlined in red in this satellite image. This area contains a mix of deciduous trees, shrubs, meadow and a diversity of shoreline habitats that make it an important stopover for a wide variety migrant bird species. This area will only become more important as residential intensification continues along nearby Lake Shore Blvd W and Parklawn Road.



The final area we believe is worthy of consideration as an ESA, is the area outlined here in the lower Etobicoke Creek valley, between Horner Avenue and Lake Shore Blvd. W. This is a rather large mixed forest in the creek valley dominated by mature Hemlock and White Pine. It is a fine example of a forest type that is uncommon within the City of Toronto.

Thank you for your consideration of these suggestions.



Sincerely,

Brian Bailey
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