ITEM 13

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TO: THE CHAIRMAN AND MEMBERS OF THE WATER AND RELATED LAND MANAGEMENT ADVISORY BOARD - MTRCA, MEETING #7/91, October 11, 1991

FROM: J. C. MATHER, DIRECTOR, WATER RESOURCE DIVISION

RE: Comments on a Background Report, "Shoreline Regeneration for the Greater Toronto Bioregion" for the Royal Commission on the Future of the Toronto Waterfront.

KEY ISSUE

The report is a useful reference for shoreline regeneration issues and considerations but needs to be carefully balanced with other public objectives and technical information as part of future waterfront planning.

RECOMMENDATION

THE BOARD RECOMMENDS TO THE AUTHORITY THAT the staff report on the review of the report, "Shoreline Regeneration for the Greater Toronto Bioregion" prepared by the Shoreline Regeneration Working Group for the Royal Commission on the Future of the Toronto Waterfront, be received;

THAT the Royal Commission be asked to consider the Authority's comments on the Shoreline Regeneration Report in preparing its final report;

THAT the staff be directed to work with Metropolitan Toronto, the Region of Durham and the area municipalities, as well as provincial and federal agencies, in the development of comprehensive and site specific shoreline regeneration plans as appropriate, through partnership agreements, municipal plans and the Environmental Assessment Act;

THAT the staff be directed to increase the emphasis on monitoring and reporting to all interested parties the results of shoreline regeneration projects as funds permit;

THAT the assessment of possible cumulative impacts, both positive and negative, be an integral component of planning for all future shoreline regeneration projects and that staff be directed to continue to investigate appropriate modelling techniques, expert advice and monitoring data to assist in such evaluations;

AND FURTHER THAT these recommendations and the staff report be forwarded to the Royal Commission on the Future of the Toronto Waterfront, the Municipality of Metropolitan Toronto, the City of Toronto, the City of Etobicoke, the City of Scarborough, the Region of Durham, the Town of Ajax, the Town of Pickering and the Premier's Advisor - Toronto Waterfront Development.

BACKGROUND

The report, "Shoreline Regeneration for the Greater Toronto Bioregion", is the product of a working group established by the Royal Commission, in response to a request by the Minister of the Environment, on behalf of the Province of Ontario. It was, in part, a response to recommendations concerning lakefilling which were made by the Royal Commission in its report, "Watershed". The Authority, in its report, "Crisis in Confidence?" also requested that the Royal Commission conduct a public review focusing on lakefilling. It was suggested by the Authority that the East Point Park proposal would be a good test case, and focus for discussion, in a comprehensive review of shoreline regeneration in general and lakefilling in particular. The report, however, is a broad review which attempts to summarize the history of shoreline changes, shoreline regeneration issues, regulatory framework, and options for policy and implementation.

It appeared initially that the work group's report would be prepared in draft early in 1991, for review by interested parties, and then finalized as background for hearings on regeneration issues and proposals. The complexity of the issues, and the time frame for the Royal Commission apparently precluded that process and limited the input by the Authority and other agencies to submissions early in the process, followed by responses to occasional questions.

Authority staff were hopeful that the report would provide insights on regeneration techniques and evaluation procedures that would help to focus and prioriza the efforts of public bodies. Unfortunately, the size of the study area, the complexity of the issues and the available time, constrained the efforts to a documentation of some of the existing conditions and a general overview of considerations that should be made in the development of a comprehensive plan for the Greater Toronto Bioregion. The waterfront included in the Greater Toronto Bioregion extends from Burlington to Newcastle.

Analysis

The report is a lengthy, well structured and easily read document that is worthy of careful reading and analysis. However, the short time available to the Authority to review and comment on the document in time to respond to the Commission necessitates a brief review.

This staff review is structured in 3 sections. Firstly, it attempts to consolidate the numerous findings and summarize them into 5 general recommendations for action. Secondly, it examines several of the specific criticisms which are directed to the Authority's projects. Finally, it addresses the potential impacts of these recommendations on some of the Authority's shoreline regeneration initiatives.

A list of some existing Authority shoreline regeneration projects and studies is appended for reference.

General Findings of the Report

The main recommendations of the Working Group's report can be grouped into 5 categories:

1. An integrated plan for the entire shoreline of the Greater Toronto Bioregion should be prepared.

2. The Provincial and Federal governments should take the lead in developing the plan.

3. No new projects should be allowed until the plan is in place.

4. The Ministry of Environment should take over the Improved Lakefill Quality Control Program and expand it to include control of soil excavation and disposal throughout the Bioregion.

5. Remaining natural areas should be protected.

Comments Concerning MTRCA

The report is generally very critical of shoreline modifications that have been undertaken in the past and are planned for the future. Included for criticism are projects by MTRCA stemming in part from the 1967 Waterfront Plan.

The concerns that are raised are not new and have been the subject of consideration in the planning, design, approvals and implementation of projects throughout the Authority's involvement in waterfront regeneration. Perhaps the best example to date of evaluations of these concerns, balanced with other public objectives, is the Colonel Samuel Smith Park environmental assessment.

Some of the specific concerns raised in the report are outlined, followed by a brief response.

1. Alteration of shoreline processes - The report is very critical of shoreline alterations which are said to affect the dispersion of discharges and restrict the shoreline's ability to "rinse itself".

   The principal target of this criticism is Humber Bay Park where it was well known from the early stages of planning that the loadings from the Humber River, Mimico Creek and the sewage treatment plant outfall were having significant impacts on water and sediment quality. It is not clear from the report how a decision to not build Humber Bay Park so as to allow a more complete "rinsing" of the contaminants to the deep basin of the lake would address any reasonable shoreline regeneration objectives or the Royal Commission principles of a waterfront that is accessible, open, useable, clean, green, etc.

2. Downdrift Impacts - The report raises the concern of the potential impact of shoreline alterations through lakefilling on adjacent beaches.

   The principal target of this criticism is Bluffers Park and the shoreline protection work elsewhere along Scarborough Bluffs and their potential cumulative impact on the Eastern Beaches.

   Bluffers Park was originally proposed within the context of an overall scheme of shoreline protection for Scarborough Bluffs. Maintenance of the Eastern Beaches was to be achieved through periodic nourishment with sand from other sources, i.e. from pits or dredged from offshore. Some nourishment has already been done and additional amounts will be required. The major influence in the near future is the possible construction of the second tank to capture combined sewage overflows and improve water quality on the beaches. The tank would appear to require substantial amounts of beach filling to create a suitable site.

   No doubt, strictly from a coastal processes point of view, if development of the Scarborough waterfront tablelands had been kept north of Kingston Road, then no shoreline protection would have been required for the foreseeable future. Alternatively, acquisition of endangered properties could have removed hazardous situations as they developed without the need for shoreline protection. These judgements were made in the early stages of the present waterfront plan in the knowledge of shoreline processes and other factors.

3. Lakefill Quality - The report expresses concern about the quality of material and potential impacts on water and sediment quality from fill losses. It goes on to recommend that the Improved Lakefill Quality Control Program, which was developed and implemented by MTRCA at the request of MOE, be taken over by MOE. The concern is that an agency which uses lakefilling to achieve some of its objectives should not be in charge of controlling the material which is used.

   MTRCA developed the present program in response to continued concerns about the quality of fill and the MOE's decision that its involvement at such a detailed, truck by truck level, was not required. MTRCA uses MOE guidelines and reports regularly to MOE and is always subject to audit by MOE. Serious contamination is brought to MOE's attention for regulatory action.

   Monitoring in the lake around active landfills continues to identify only minimal impact from the filling process.

4. Contamination of sport fish - The report raises concerns that the bays created by lakefill projects affect contaminant concentrations in fish.

While contaminant levels in fish are a serious lake-wide concern, it is unlikely that waterfront parks are a significant contributor, even in the sense of cumulative impacts. Evidence suggests that the lake based fisheries resource is impacted from lake-wide impacts, from discharges and runoff from use which obviously require remedial actions. The complexity of this issue was reflected in the report by the work group's acknowledgement that members could not agree on whether small bays were good features or bad.

5. Habitat creation - The report is critical of plans to construct a wetland and fisheries habitat as part of the capping of dredged material disposal areas at Tommy Thompson Park because of contaminant uptake concerns.

This issue has been addressed at length as part of the planning for the project. This issue is indicative of the complexity of these matters given that some experts have suggested that the existing habitat is so important, even before it is covered with cleaner material, that it should be retained.

6. Boat Clubs - The report is critical of boat clubs on the grounds that the harbours built to accommodate them have impacts, the boaters do not pay the full cost of creating the facilities, and the public do not have access.

The Authority has explored and implemented several kinds of boating facilities. We have made mistakes and we have had successes. We still feel generally that boating clubs provide community based and relatively affordable boating. The progress being made to reduce fencing, provide better public access and a higher community profile at Colonel Samuel Smith Park is being done in conjunction with Etobicoke and Metro. The rental rate policy is under review by Metro Council but clearly the concern is to try to keep boating financially available to as wide a range of income levels as possible. Virtually all public recreation activity is subsized to some degree. The boaters make substantial capital and annual investments in the areas they develop and lease.

7. Colonel Samuel Smith Park - The report includes an analysis of facilities planned and built at Colonel Samuel Smith Park. It is critical of the Authority for not providing all of the public amenities in the original plan while catering to the boating interests.

This matter has been discussed separately with the Royal Commission staff and all the involved agencies. Hopefully, the matter is resolved but it appears in the report and requires a brief response. The Authority was careful to build the lakefill in accordance with the undertaking as approved by the Environmental Assessment Board - December 1980. The storm water treatment facility is operating in accordance with the conditions of approval. The boating uses are being developed in accordance with the plan. Many of the other public amenities are affected by the actions of others and it is a fact that plans change over 15 years. Some facilities were originally planned on Humber College lands as shared facilities. Humber College has changed its plans. The Province of Ontario has proposed, in conjunction with Humber College, a major housing development which impacts on the park plan. The landscaping details in some of the park areas have been dropped in favour of a more natural, lower maintenance treatment. Thirty-one acres were acquired from the hospital site for public open space which was not included in the original plan.

Shoreline regeneration plans, as with all plans, must have some flexibility provided there is a process to control changes. There is no shortage of process on the waterfront.

Implications for MTRCA

If the recommendations of this work group's report were implemented, there are some possible implications for MTRCA projects. The six areas of primary concern are as follows:

(a) East Point Park - This project might be considered as a new project which could not proceed until the integrated plan for the Greater Toronto Bioregion was completed. Given the complexity of these issues and the differing opinions among experts on any given site, it is difficult to imagine such a plan being completed even though it is a desirable objective.

It seems preferable to have the project proceed through the environmental assessment with particular care being given to the concerns addressed by the working group and the principles provided in "Watershed".

(b) Tommy Thompson Park - marsh creation - The work group's concerns with this project could lead to a decision to delay consideration until completion of the plan for the Greater Toronto Bioregion. We believe it is an important pilot project for regeneration which is being done within the process of the Environmental Assessment Act and with the benefit of extensive agency and public input. In fact, the Authority is required as a condition of the Keating Channel Environmental Assessment approval - September 1986 to cap Cell 1 by December, 1992.

(c) Lakefill Program - To our knowledge, MOE and the construction industry have accepted the Authority's performance in this area. Certainly the quality of material being used in lakefills has improved significantly.

The current extremely low level of construction activity has resulted in dramatic reductions in surplus material volumes. We have used this quiet period to investigate and acquire more sophisticated testing equipment for better evaluation, on site, of fill quality. We are also poised to expand the program to inland sites.

It should be noted that during busy construction periods, revenues exceed costs of the program and the surplus revenues were applied to other regeneration activities such as the storm sewer treatment facility at Colonel Samuel Smith Park. Loss of revenues from this program would be a serious setback.

(d) Scarborough Shoreline Protection - The only major section of shoreline which still requires protection is the Sylvan Avenue area. If this was considered to be a new project that had to await the completion of the plan for the Great Toronto Bioregion, then erosion would continue.

This section is also a significant portion of the potential shoreline trail which is a high priority for most agencies with a waterfront interest.

(e) Provincial Funding - The working group's uncertainty about specific shoreline regeneration initiatives and the call for another study could result in reallocation of provincial funding away from the Authority's projects. Such a result would be particularly disastrous now when the priority for the Authority over the next 3 years, as recently approved in the capital project for 1992-1994, is to work with Metro on the very kinds of evaluations that the work group is recommending.

Summary

The working group's report is an important statement about the need for ecosystem planning, particularly in a waterfront context. It is rightly critical of many shoreline alterations and abuses but probably over critical of others. It raises some of the issues that present plans are trying to address. It is not a plan in itself but it does contain some suggestions for future regeneration activities. It can serve as an important evaluation tool for future plans and projects but must be balanced with other evaluations as well.

Existing MTRCA Shoreline Regeneration Efforts and Related Studies

A list of some existing shoreline regeneration projects may be useful reference in consideration of the recommendations of the Working Group.

1. Acquisition and protection of shoreline marshes.

2. Revegetation of eroding shorelines with indigenous species.

3. Waterfront bird survey.

4. Fisheries studies.

5. Lake current study at East Point Park - measurements and modelling.

6. Storm water treatment including biological treatment of recovered oils and other organics at Colonel Samuel Smith Park.

7. Watershed Strategies - Rouge, Don, Humber, Duffin.

8. Water, Sediment, Benthic monitoring including contaminant uptake.

9. Wetland creation below Scarborough Bluffs at South Marine Drive and Bluffers Park and at Tommy Thompson Park.

10. Fish habitat enhancement - Bluffers Park.

11. In conjunction with Metro Planning:
    - GIS analysis of waterfront environmentally significant areas
    - Coastal processes review and evaluation procedures
    - Resource Management Analysis as background for new Metro Waterfront Plan.

12. Tern Habitat Improvement at Tommy Thompson Park.

13. Shoreline Management Master Plan - Scarborough.

14. Detailed Laboratory Scale Testing of Erosion of Cohesive Shorelines.

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