

# ONTARIO FEDERATION OF ANGLERS & HUNTERS

P.O. Box 2800, 4601 Guthrie Drive, Peterborough, Ontario K9J 8L5  
Phone: (705) 748.6324 • Fax: (705) 748.9577 • Visit: [www.ofah.org](http://www.ofah.org) • Email: [ofah@ofah.org](mailto:ofah@ofah.org)



*Ontario Conservation Centre*

OFAH FILE: 420  
May 10, 2022

Office of the Mayor  
City Hall  
100 Queen Street West, 2<sup>nd</sup> Floor  
Toronto, Ontario  
M5H 2N2

To Mayor John Tory:

RE: Recommendations to ensure angling is protected and respected now and into the future at Grenadier Pond and other areas in the City of Toronto

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest, non-profit, fish and wildlife conservation-based organization, representing 100,000 members, subscribers and supporters, and 725 member clubs. We are reaching out to the City of Toronto regarding legitimate concerns over the ongoing threat of an angling ban at Grenadier Pond, as well as other areas in Toronto. Provided is a summary of seven recommendations, further elaborated on in this letter, to ensure angling is protected and respected now and into the future:

1. Develop an official, transparent, publicly available position statement and policy direction from the City of Toronto that embraces, fosters, and recognizes fishing as a sustainable outdoor activity.
2. Expand and enhance fishing and access opportunities at Grenadier Pond and other locations throughout the city including within ESAs (where applicable).
3. Explicitly identify fishing as a compatible and sustainable activity within ESAs.
4. Establish a *collaborative working group* consisting of anglers and non-anglers (TUFA, NEC) and agency representatives (OFAH, TRCA, City of Toronto) to develop key deliverables and action items to achieve mutually beneficial conservation goals and objectives.
5. Implement an active removal and control program for non-native and invasive species via the "collaborative working group" (TUFA, NEC, OFAH, TRCA, City of Toronto).
6. Ensure law-abiding anglers are able to enjoy fishing opportunities in city parks free from harassment.
7. Implement the recommendations outlined in *Race and Nature in the City* (2020) especially as they apply to fishing by: 1) increasing racial diversity in communications; 2) promoting urban nature and increasing access for racialized youth; and 3) increasing comfort in nature through guided activities and education.

## **Background and context**

For many years, Grenadier Pond has been the target of a special interest group's anti-fishing agenda and, in the face of COVID-19, our concerns over a potential outright ban have been heightened. In a letter to city councillors dated May 31, 2021, the High Park Natural Environment Committee (NEC) asserts visitor traffic has increased since the pandemic putting greater stress on the natural environment at High Park and calls for a "prohibition of fishing at Grenadier Pond." Furthermore, NEC attempts to leverage the Environmentally Significant Areas (ESA) designation and other classifications (i.e., Provincially Significant Wetland [PSW], Areas of Natural and Scientific Interest [ANSI]) in an effort to justify the prohibition. In a rebuttal to city officials later that year (dated June 15, 2021), the NEC elaborates on various perceived issues and topics related to angling pressure, the impacts of angling on fish and wildlife, excess nutrients, habitat protection and, again, use special designations to convince the City of Toronto to ban angling at Grenadier Pond. In a newsletter distributed in April 2022, the NEC continues to criticize the unsuitability of fishing at High Park, as well as requesting that a Family Fishing Day event not be held.

**Embracing angling in the City of Toronto**

There are numerous examples where Parks, Forestry and Recreation Division (PFR) has gone on record in support of angling, including at Grenadier Pond. However, there have been specific situations and instances where city staff do not appear to share the same sentiments, which is cause for concern. For example, the NEC newsletter states the Park Supervisor acknowledged “the city’s overall support of fishing does not recognize the special designation the park has” and, according to NEC’s citation, the supervisor stated the previous agreement made between stakeholders is insufficient and would be looking to further consult with Policy and Planning staff.

Unfortunately, there are other instances where individuals have taken matters into their own hands. On Saturday, June 30, 2015, Toronto Urban Fishing Ambassador (TUFA) was supporting a picnic organized by CUPE Local 79 and providing fishing opportunities to children at Grenadier Pond. The activities were mapped out and included on the event permit secured by CUPE Local 79. Despite that, the Park Supervisor attended and attempted to stop the fishing activity. In doing so, they repeated the assertion that fishing was going to be banned from the park, had staff take photographs which made the event participants feel uncomfortable, and had the National Fishing Week banner attached to the fishing pier removed (ironically, at the time, the City of Toronto was a National Fishing Week partner).

Though fishing is a permitted activity in City of Toronto parkland, except where signs are posted indicating fishing is prohibited, there is clear evidence that individual staff have chosen to impose their own personal beliefs about angling as official policy. The overarching issue for the OFAH is if anti-fishing sentiments are held by decision-makers the threat of a ban becomes even more possible and has broader implications. The City of Toronto expresses the importance of balancing access and the protection of natural areas with recreational uses but depending on someone’s feelings towards fishing, special protections under the ESA banner could be used outside of their intended purposes. Activities within ESAs are limited to those that are compatible with the preservation of their natural features and ecological functions; therefore, if fishing were to be deemed an incompatible activity, bans and other restrictions could result. As evidenced by comments made by PFR, restrictions like these have occurred as “there is a partial ban on fishing at Grenadier Pond due to its designation as both an ANSI and ESA” (October 25, 2016). A study commissioned by the city led to the establishment of sixty-eight new ESAs (a total of eighty-six) and the boundaries of fourteen were expanded. Fishing doesn’t automatically threaten endangered species and/or special designations – they can coexist. If ESAs continue to be determined to be vulnerable to fishing because of subjective ideologies there would inevitably be further-reaching, city-wide consequences. For these reasons *the OFAH is seeking an official, transparent, publicly available position statement and policy direction from the City of Toronto that embraces, fosters, and recognizes fishing as a sustainable outdoor activity.*

**Current restrictions and enhancing opportunities**

The OFAH disagrees with NEC’s opinion that fishing is an unsustainable activity at Grenadier Pond, and we would like to take the opportunity to shed light on numerous safeguards currently in place to help conserve the fishery. For example, anglers are highly regulated and must have a valid recreational fishing licence or deemed licensed to legally fish in Ontario, follow zone-wide seasons, limits and exceptions, and adhere to all relevant rules and regulations outlined in various pieces of legislation including the *Ontario Fishery Regulations* and the *Fish and Wildlife Conservation Act (FWCA)*. Due to private land that exists along the entire west shoreline of Grenadier Pond, fishing is inaccessible from this location. Moreover, fishing is not allowed outside the permitted area in Grenadier Pond or in other ponds in High Park and watercrafts are prohibited in Grenadier Pond. The only fishing that is permitted is confined to a narrow strip of shoreline at the central/southeast location of the pond. This reduction of fishing access at Grenadier Pond was not supported by scientific advice from the Toronto and Region Conservation Authority (TRCA) or the Ministry of Northern Development, Mines, Natural Resources and Forestry (NDMNR), and is contrary to what had previously been agreed to by all stakeholders. Despite the personal opinions of some current city staff, PFR previously confirmed Parks and its partners do not share NEC’s allegations that angling has a negative impact on the fish population and wildlife at Grenadier Pond. As such, *the OFAH requests the City of Toronto explore, expand, and enhance fishing and access opportunities at Grenadier Pond and other locations throughout the city including within ESAs (where applicable).*

**ESA designations do not preclude fishing**

It is undeniable NEC is attempting to leverage designations and other classifications to ban fishing at Grenadier Pond and other ESAs across the city. In their feedback to Toronto's Draft Biodiversity Strategy, NEC believes there should be strengthening and long-term commitment in the protection of new and existing ESAs. Following the Aurora District's review and confirmation of a new wetland evaluation for the provincially significant Grenadier Pond Wetland Complex (NDMNR, 2022), NEC has taken this status as grounds for banning fishing. However, there are numerous examples of areas with special designations where activities like fishing, hunting, and trapping exist sustainably. Kawartha Highlands Provincial Park is in the "Greater Golden Horseshoe" and exhibits various significant ecological features including globally rare and provincially significant alvar, numerous provincially significant species, and contains two ANSIs. As outlined in the Management Plan (2008), "...fishing and hunting will continue to be integral components of the park's recreation program" and there are also "...portions of 24 registered trapline areas within the park and all are considered *existing*." There are numerous coastal wetlands within the Great Lakes, including the GTA, that have various special designations and statuses (e.g., ANSI, Provincial Wildlife Area, Important Birding Area, PSW, Significant Wildlife Habitat, species at risk), and permit sustainable use activities like fishing and hunting. We value and support Toronto's proactive approach in protecting biodiversity and natural areas through land use policies and regulations including ESA designations; however, *the OFAH requests that the City of Toronto explicitly identify fishing as a compatible and sustainable activity within ESAs.*

**Managing ecological threats and restoring Grenadier Pond**

The OFAH agrees that the ecological integrity of Grenadier Pond can be improved, but this is made challenging by legacy impacts of urbanization and encroachment, particularly along the westernmost shoreline. Surface water runoff from developed areas and High Park, and human activities from neighboring properties (and beyond) contribute pollutants, nutrient loadings (e.g., Canada Goose and dog feces), and other deleterious substances that compromise the health of Grenadier Pond. Past habitat loss, fragmentation, and degradation have occurred, and the health and condition of Grenadier Pond and High Park will never be returned to its natural state. While there have been occasional incidents related to bad behaviour of a few delinquents, these are undoubtedly one-off exceptions within the responsible angling community that pale in comparison to the overarching stressors at large. Anglers are not the environmental tipping point as some would lead you to believe but, quite possibly, the greatest stewards and assets for ESAs. Great things could be achieved through cooperation, by accepting differences, and breaking down barriers to accomplish common goals. To this, *the OFAH requests that the City of Toronto establish a collaborative working group consisting of anglers and non-anglers (TUFA, NEC) and agency representatives (OFAH, TRCA, City of Toronto) to develop key deliverables and action items to achieve mutually beneficial conservation goals and objectives.*

The TRCA does an exceptional job at monitoring and assessing fisheries in Toronto and the GTA's watersheds and waterfront; however, relatively low survey effort at Grenadier Pond could result in unrepresentative site catches. Moreover, seasonality and annual variations have not been taken into consideration, no baseline levels and/or thresholds have been established, and we are unaware of any creel data by the NDMNR to help determine angling effort. As such, the OFAH disagrees with NEC's statement that the fishery is experiencing a "textbook illustration of an ecological collapse." Electrofishing surveys have shown a surprising variety of native and non-native species for a relatively small urban pond, apex predators have been consistently captured and, more recently in 2016, a variety of age classes of Largemouth Bass were caught including nine other species. The number of species in a given unit of area (i.e., species richness) is a common measure of biodiversity, the presence of top predators provide some insight into ecosystem health and ecological structure and dynamics, and age-class diversity tells us bass are spawning successfully, carrying out their life processes, and reaching maturity.

One obvious concern identified from the monitoring and assessment data is the presence of Common Carp and other non-native and invasive species like Goldfish, Goldfish x Common Carp hybrids, and White Perch. The negative ecological impacts of Common Carp are well documented. As summarised in Badiou et al. (2011), Common Carp can directly and indirectly effect aquatic ecosystems in the following ways: "1) increasing total suspended solids, sedimentation and erosion; 2) increasing water column nutrient concentrations; 3) increasing the biomass and altering the community structure of phytoplankton; 4) decreasing submerged macrophyte abundance; 5) decreasing large zooplankton; 6) decreasing benthic invertebrates; 7) reducing native fish diversity and abundance; 8) competing with waterfowl for food resources; and 9) by altering contaminant cycling."

Aside from Common Carp, other non-native and invasive fish species can impact aquatic ecosystems by competing with native fishes for food and habitat, altering food webs, and preying on sportfish eggs and larvae populations. Thus, the most immediate and manageable conservation concern related to the aquatic environment at Grenadier Pond would inevitably be controlling the ongoing threat of non-native and invasive species. By enhancing management in this way, natural features, fish, habitat, wildlife, the environment, and the special designations and protections at Grenadier Pond (ESA, ANSI, PSW) will be more effectively conserved. For these reasons, *the OFAH recommends the “collaborative working group” (TUFA, NEC, OFAH, TRCA, City of Toronto) establish and implement an active removal and control program for non-native and invasive species to ensure the ongoing productivity and sustainability of the fishery and conservation of native biodiversity.*

### **Putting a stop to harassment**

Individuals identified as members of the NEC and the self-proclaimed “Grebe Gang” have deliberately harassed people and appear to have broken conservation laws under the FWCA (Section 13 “Obstruction of hunting, trapping or fishing”) but received no disciplinary action. Regrettably, the OFAH has felt it necessary to express our disappointment over these situations in official letters to Mayor John Tory and Members of Council and City of Toronto’s Park Branch, as well as publishing several articles on the subject in *Ontario OUT of DOORS* magazine. We presume that other park events permitted by the city – from birthday parties and cultural celebrations to religious festivals – would be protected from harassment. To that end, *the OFAH requests the City of Toronto ensure law-abiding anglers are able to enjoy fishing opportunities in city parks free from harassment.*

According to the National Household Survey (2011) over half of those living in Toronto were born outside of Canada and well over 1.2 million people identified as a visible minority. These statistics don’t come as a surprise because studies have indicated immigrants typically chose to settle in the largest urban centres and, over the past two decades, eighty percent of all immigrants to Ontario settled in the GTA (Ministry of Finance, 2020). Just like Toronto, its angling community is also made up of a diverse group of people with various cultural and ethnic backgrounds and fishing should be fostered in a way that equitably engages and accepts all types of anglers. Many of those people living in urban areas do not have the means (financial, vehicles/transportation, knowledge/understanding, etc.) to travel long distances for these experiences; therefore, by facilitating sustainable, accessible fishing opportunities in urban settings, this provides unique strategies for breaking down socio-economic barriers. One study that looks at meaningfully engaging racialized communities in nature and nature-based programming in urban areas is *Race and Nature in the City* (Scott and Tennesi, 2020). Scott and Tennesi (2020) state “urbanization is the leading cause for the increasing psychological distance between humans and nature” and, as a result, can lead to a “lack of care and stewardship.” The GTA study cites numerous examples on the critical importance of making direct connections to nature and the human psyche, as opposed to solely focusing on cognitive experiences, and lists “fishing” as an activity that can help overcome knowledge and information, economic, cultural, as well as psychological barriers to accessing nature. *The OFAH urges the City of Toronto to implement the recommendations outlined in Race and Nature in the City (2020) especially as they apply to fishing by: 1) increasing racial diversity in communications; 2) promoting urban nature and increasing access for racialized youth; and 3) increasing comfort in nature through guided activities and education.*

### **Moving forward**

Ontario’s Provincial Fish Strategy (2015) maintains that fishing “...contributes to the nutritional needs and the social, cultural and economic well-being of individuals and communities in Ontario.” It is a closely managed, sustainable activity that generates significant funding to Ontario’s Fish and Wildlife Special Purpose Account as one hundred percent of licence sales go directly towards the management and conservation of fish and wildlife in Ontario. That said, anti-fishing groups in the City of Toronto are too involved in isolated incidents to look at the situation as a whole and appreciate angling as a compatible activity with the conservation of Toronto’s natural resources and as a nature-based linkage to connect racialized individuals to the outdoors.

As you may be aware, the OFAH operates the TackleShare and Travelling TackleShare programs, both of which have locations within Toronto, and also partners with various agencies on Family Fishing Week events. We administer an Atlantic Salmon classroom hatchery program that has several units in Toronto schools, we sit on the GTA Recreational Fishing Committee, provided comment on the urban recreational fisheries strategy (“Fishing in Your Backyard”) and, in the past, have contributed to the city’s Fishes of Toronto publication. In the course of these programs and activities, we have become familiar with and have worked with TUFA, an organization that has spearheaded shoreline and park clean-ups, including establishing used fishing line deposit bins, and promotes angling as a recreational activity within the city. It is clear that TUFA and the angling community are assets to Toronto’s natural systems, not a hindrance to achieving environmental goals and objectives.

Anglers have been leaders in conservation and aquatic habitat restoration long before NEC came into existence. The OFAH’s own history has connections to Toronto and, when it was first formed in 1928, this new Federation consisted of ten community-based outdoors groups that aligned with the Toronto Anglers Association working for better stewardship of Ontario’s natural resources. High Park would not exist if it was not for the efforts of angler and hunter John Howard, an architect and land surveyor who donated the land in 1873 for use as a “public park for the free use benefit and enjoyment of citizens of Toronto forever.” Anglers can be the solution not the problem, and NEC would be far more effective in creating long-term success in working with TUFA and the angling community on issues such as littering. We respectfully submit these recommendations to ensure fishing is enshrined in the City of Toronto’s policies, to guarantee staff and the public have guidance and are aware of these positions, and to avoid future harassment directed at the angling community. Thank you for your time and consideration.

Yours in Conservation,



Mark Ryckman  
Manager, Policy

cc: David Clark, TUFA  
Councillor Gord Perks, Parkdale-High Park  
John MacKenzie, Chief Executive Officer, TRCA  
Dan Thompson, District Manager, NDMNRF  
Karen Yukich and Leslie Gooding, NEC co-chairs  
OFAH Board of Directors  
OFAH Fisheries Advisory Committee  
Angelo Lombardo, OFAH Executive Committee  
Matt DeMille, OFAH Director, Policy & Programs  
Chris Robinson, OFAH Manager, Programs  
OFAH Policy & Programs Staff

**References**

Badiou P, Goldsborough LG, and Wrubleski D. 2011. Impacts of the Common Carp (*Cyprinus carpio*) on freshwater ecosystems: A review. Carp: Habitat, Management and Diseases (Chapter 4). Nova Science Publishers, Inc. Editor: J. D. Sanders and S. B. Peterson. 20 pp.

Ministry of Finance. 2020. Ontario’s Long-term Report on the Economy. [Online] <<https://files.ontario.ca/mof-long-term-report-book-2020-06-03-en.pdf>>. Queen’s Printer for Ontario. 80 pp.

Ministry of Natural Resources. 2008. Kawartha Highlands Provincial Park Management Plan. [Online] <<https://www.ontario.ca/page/kawartha-highlands-provincial-park-management-plan>>. Queen’s Printer for Ontario.

Ministry of Northern Development, Mines, Natural Resources and Forestry. 2022. Letter on the “New Provincially Significant Grenadier Pond Wetland Complex, City of Toronto”. [Signed] Dan Thompson, District Manager, Aurora District.

Ministry of Northern Development, Mines, Natural Resources and Forestry. 2015. Ontario’s Provincial Fish Strategy – Fish for the Future. Queen’s Printer for Ontario. 63 pp.

National Household Survey. 2011. City of Toronto Backgrounder (May 9, 2013). Immigration, Citizenship, Place of Birth, Ethnicity, Visible Minorities, Religion and Aboriginal Peoples. [Online] <<https://www.toronto.ca/wp-content/uploads/2017/10/9793-2011-NHS-Backgrounder-Immigration-Citizenship-Place-of-Birth-Ethnicity-Visible-Minorities-Religion-and-Aboriginal-Peoples-.pdf>>. 10 pp.

Scott JL and Tennesi A. 2020. Race and Nature in the City – engaging youth of colour in nature-based activities – A community-based needs assessment for Nature Canada’s NatureHood. Nature Canada. [Online] <<https://naturecanada.ca/wp-content/uploads/2021/04/Race-Nature-in-the-City-Report.pdf?>>. 39 pp.