

February 15, 2018

Ms. Nancy Gaffney
Waterfront Specialist, Waterfront Strategies
5 Shoreham Drive
Toronto, Ontario
M3N 1S4

Dear Ms. Gaffney,

This letter is my response to your correspondence to me, dated November 27, 2017. The letter's purpose is to correct some of the significant inaccuracies in your correspondence, given the Toronto and Region Conservation Authority's (TRCA's) intention to obliterate 1.8 hectares (4.48 acres) of beach/dune communities, pursuant to the Scarborough Waterfront Project (SWP). See: [Draft Environmental Assessment](#) (Draft EA), (Table 7.2, p. 7-10).

Despite the TRCA's unflinching attempts to characterize the matter otherwise, at least 1 kilometre of beach in the East Segment of the SWP will be destroyed, should the project go ahead in its current form, as described in the *Draft EA*. Furthermore, the project, in the East and West segments, in significant sections and by various means, will deny Torontonians their inherent right to access the Lake Ontario. Specifically, I am referring to the ability to walk along the shore, and to swim, surf, play, and fish in the water. My remarks, where applicable, apply both to the East and West Segments of the SWP.

Today the Scarborough Bluffs are widely recognized as the most important geological feature on the north shore of Lake Ontario. To Torontonians though, the cliffs and remaining sand beaches, with unparalleled diversity of animal and plant life at the waters' edge, mean even more. *They are a place of cultural memory*. The vicinity of the Scarborough Bluffs was inhabited by various Indigenous peoples for millennia. After European contact, French coureurs de bois, traders and explorers referred to the area as *Les grands Ecores*, though it was through Mrs. Simcoe, wife of the first Lieutenant Governor of Upper Canada, John Graves Simcoe, that the area eventually obtained its current characterization as the Scarborough Bluffs. Meandering along the shore at the bottom of the cliff, where the water meets the land, gives way to a deeper kind of knowing that grounds us in time and place and connects us to the kaleidoscope of the past. That is something rare in this city and that is why I cannot let your erroneous comments go unanswered.

So again, I put pen to paper. I have broken your comments down into five major themes, which I respond to chronologically below.

1. ACCESS TO THE SHORE

Your letter indicates that access to the shore will not be constrained by the project. I have continually stated that the application of construction debris and construction garbage, multiple meters high, across the sand of Grey Abbey Beach will obliterate the shore and that therefore, access will be denied in the most egregious way. The [Oxford Dictionary](#) (2017) defines "shore" as the, "The land along the edge of a sea, lake, or other large body of water".

It does not escape my notice that you have employed different terminology when responding to my statement about the destruction of the shore. You have employed the word, “shoreline”. The [*Oxford Dictionary*](#) defines “shoreline” as the, “line along which a large body of water meets the land”, and that is just what you plan to install with your Stalinist concrete embankment – an unbroken concrete barrier that removes the shore.

Ms. Gaffney, you know that it is logically inconsistent to assert that access may be gained to the very thing you are intending to obliterate.

Furthermore, no intelligible thread links the problem of private ownership of the shore to the installation of the concrete embankment at the waters’ edge that the TRCA proposes.

2. ENVIRONMENTAL DESTRUCTION

It is true, Ms. Gaffney, that the *Draft EA/EA* indicates a net benefit to the ecological system within the parameters of the SWP. Unfortunately, in matters impacting delicate ecological systems, straightforward mathematical equations that acknowledge collateral damage to the environment as part of the equation are unhelpful and often misleading.

The overall benefit does not directly relate to the destruction meted out to the habitat of several rare and threatened species (including the Bank Swallow) in the East Segment of the SWP. The comment does not override the TRCA’s previously authored report, [*Scarborough Shoreline: Terrestrial Biological Inventory and Assessment*](#), which strongly recommends that natural shoreline conditions be maintained in the East Segment. The overall benefit, even if taken as giving credence to the shoreline hardening that the TRCA proposes, is in direct conflict with the TRCA’s earlier report, also authored by well regarded professionals in the field. Both reports cannot be correct on the matter of whether further shoreline hardening is appropriate in the East Segment of the SWP. The TRCA cannot have it both ways on the issue.

Finally, your comment that, “Taking into consideration the expansion of the beach at Bluffer’s Park there will be a net loss of only 200 m of sandy shoreline across the entire SWP” is, with respect, more mathematical bafflegab. To suggest that sandy infill in the West segment to accommodate the Waterfront Trail compensates for the irretrievable loss of habitat to rare and threatened species is, at best, intellectually dishonest and unbecoming the purpose of any credible conservation authority.

3. EROSION CONTROL

Your position appears to be that there is no other alternative than shoreline hardening to address what the TRCA views as unacceptable rates of erosion in the westerly portion of the East segment. There is little doubt that the rate of erosion across the SWP, and its need for redress, will be argued by experts with differing opinions on the matter in the months and years to come. Suffice it say that it is an uncontroverted fact that the TRCA is aware of, has recommended, and has implemented other successful approaches to erosion control along the Toronto shore that do not involve the complete and utter destruction of beaches, dunes, flora, fauna and habitat.

Case in point: Bluffer’s Beach in the West Segment of the SWP. Erosion control was addressed in that area years previously by building out the negligible beach and the installation of groynes to hold the sand in place. A version of this approach is in fact the preferred alternative for the eastern portion of the West Segment of the SWP. It is unacceptable to employ a far more devastating

approach to erosion control in the East Segment when the TRCA can build out the beach, if the assertion is to be accepted that erosion in that area of the SWP justifies intervention.

In fact, one need look no further than the TRCA's plan for the south shore of Toronto Island to glean a more enlightened way to redress the impacts of erosion. The TRCA's "Revised Preferred Concept, 2017" involves, "beach *restoration*" (my italics) and continuous adaptive sand management", rather than beach destruction. Specifically, the concept is to, "provide shoreline protection, with focused sand management, as well as natural and engineered treatments", including the institution of a submerged cobble reef.

Further, the TRCA is well aware of, and in fact as recently as 2017 attended a conference on the approach of the Netherlands in relation to erosion control, where "soft" solutions along the coast through sand augmentation of the beaches have been applied for at least 20 years without recourse to shoreline hardening. See: <http://www.cbc.ca/radio/ideas/go-with-the-flow-using-nature-to-help-fight-climate-change-1.4167867>

4. PLACEMENT OF THE WATERFRONT "TRAIL"

You argue that because the Waterfront Trail is not appropriate on the headland, above the beach, that it therefore must be placed at the waters' edge. The assumption implicit in this argument is that the Waterfront Trail system must be continuous, at the waters' edge. Ms. Gaffney, you have failed to address the elephant in the room. The foundational document of the *Royal Commission of the Future of the Toronto Waterfront*, entitled "[Regeneration, Toronto's Waterfront and the Sustainable City: Final Report](#)" makes it clear that, "in areas of ecological sensitivity... a continuous trail may not be possible" (p. 179). If the TRCA does not support the current placement of a section of the Waterfront Trail near the edge of the Bluffs, then the trail could easily be re-routed outside of the boundaries of the park.

Mark Mattson, Founder and President of Lake Ontario Waterkeeper, has said that the TRCA's current plan "seems dated" for the 21st century. Indeed, more creative solutions can be found for the placement of the trail, including the consideration of various forms of elevated veloways. In Melbourne, Australia a cantilevered bike path, attached to the existing railway viaduct, was recently considered, see: <http://www.smh.com.au/business/momentum-gathers-for-cycle-path-in-the-sky-20141029-11dhff.html> This approach merits consideration and would potentially allow the TRCA to by-pass the ecologically sensitive shore, while maintaining the Waterfront Trail in the park.

5. PUBLIC CONSULTATION

You have indicated that, "the consultation undertaken in support of the SWP is consistent with the MOECC Code of Practice for Consultation for EAs and best practices". I stand by my earlier comment that the public consultation process conducted by the TRCA for the SWP was something akin to a series of bad Monty Python out takes. Below are two examples of why I continue to maintain this position.

i) On February 19th, 2016, you and one of your representatives met with me, Mark Mattson of Lake Ontario Waterkeeper and Jennifer Falvy of Natural Shorelines at the Toronto Hunt. At that meeting, you floated the idea of hardening the western half of the East Segment of the SWP, while the easterly portion of the Segment would remain in its natural condition. You asked my opinion on that approach and I told you that it was contrary to the TRCA's own authored report, [Scarborough Shoreline: Terrestrial Biological Inventory and Assessment](#), and flew in the face of sound

environmental practice. One and a half years of public dissent and outcry resulted in the TRCA acceding to a further reduction in the concrete by approximately 16 percent.

How ironic though, that after public “consultation” on the taxpayer’s dime, the TRCA reached virtually the same conclusion that was suggested in the original meeting at the Toronto Hunt: the destruction of a substantial stretch of the last remaining natural beach on the mainland of Toronto. You want to know the ultimate irony? The taxpayer gets to foot the bill for the entire show. If the TRCA gets its way, the public will keep paying – by your latest estimate, at least 100 million dollars, with multiple years of community disruption.

ii) Now, to the heart of your representation to the TRCA Board on July 28, 2017. You have not adequately addressed my serious concern with respect to your representation to the Board, prior to the vote, that the public support for the SWP was evenly balanced. If it is your position that the comments in the *Draft EA* are, in fact, evenly balanced, you should say so. It is my position that the comments, even in the absence of the over one thousand signatories to the online [East Point Shoreline and Bluffer’s Beach petition](#) appear to be overwhelmingly against the paving of Grey Abbey Beach. See: *Draft Environmental Assessment* (Draft EA), (Appendix L.8, Public Comments).

Finally, you indicate in your letter to me that the [petition](#) of over one thousand people who oppose the paving of Grey Abbey Beach was not “formally submitted” to you, and that this is the reason it was not included in the comments within the *Draft EA*. Ms. Gaffney, with respect, you are dancing on the head of a pin. It is my understanding that you were the recipient of each and every signature, at least in regards to the over one thousand signatures with respect to the online portion of the petition.

Furthermore, you were formally advised of the petition at the PIC#2 meeting on June 28, 2016. During the question and answer period, Steven Smith of Natural Shorelines advised you publically of the petition and read the petition out loud to you, in entirety.

I look forward to hearing from you in due course. I’d also be grateful if you would advise me as to the date that City Council will be considering the matter as soon as possible.

Yours truly,

A handwritten signature in black ink, appearing to read 'M. Jane Fairburn', written in a cursive style.

M. Jane Fairburn

Author, *Along the Shore: Rediscovering Toronto’s Waterfront Heritage*

<http://janefairburn.com/>

<https://www.facebook.com/janefairburnalongtheshore/>