

October 10, 2012

Dear Right Honourable Stephen Harper
Hon. Jim Flaherty, Minister of Finance and Minister for the GTA
Honourable Peter Kent, Minister of the Environment
Alan Latourelle, Parks Canada CEO
Pam Veinotte, Superintendent, Rouge National Park

RE: Creation of Rouge National Park

Thank you for announcing the creation of Rouge National Park within the Rouge, Petticoat and Duffins watersheds which flow to Lake Ontario within, and near, the Toronto Lake Ontario "Area of Concern".

For more than 25 years, Great Lakes United has been the leading international coalition committed to promoting and coordinating basin-wide initiatives to protect and restore the Great Lakes and the Saint Lawrence River. Through a broad network of organizations and individuals, Great Lakes United pursues the development and implementation of policies and actions that support the health of the world's largest freshwater ecosystem and its communities.

As Environment Canada's website notes:

The Great Lakes ecosystem provides a critical source of income, water, food and energy, key transport routes and important spaces for recreation and tourism. Thriving habitats and native fish and wildlife communities contribute to the social and economic vitality of the Great Lakes. ... Unfortunately, many human activities put pressure on the ecosystem that results in the loss or degradation of some habitats and threatens the species that those ecosystems support.

Environment Canada's summary of outcomes associated with the 2012 GLWQA include:

- *Within two years, complete the development of and begin implementing lakewide habitat and species protection, restoration, and conservation strategies;*
- *Increase awareness of native species and habitat and the methods to protect, conserve, maintain, restore and enhance their resilience*
- *Contribute to the recovery of populations of species at risk and the restoration of degraded habitat;*
- *Increase habitat areas in the Great Lakes.*

The Rouge River Watershed and beach are within the Toronto "Area of Concern", under the Great Lakes Water Quality Agreement. Water quality, fish and wildlife habitat, and public uses are impaired within this area. Rouge Beach was closed to swimming at Lake Ontario on 25 of 92 reported days in Summer 2011, and it recorded the highest E. coli levels of the 11 Toronto beaches on 42 of those 92 days (<http://www.toronto.ca/health/beaches/ecoli.htm>).

Fortunately, more than 100 km² of public land surrounds the Rouge, Petticoat and Duffins River watersheds in Toronto, Markham and Pickering. The vast majority of these public lands are designated "natural heritage system" within the Provincial Greenbelt. These public Greenbelt lands are part of the mixed woodland plain and Carolinian forest zones of southern Ontario, - the life zones with the greatest biological diversity and most endangered species in Canada but the fewest natural environment parks.

The current Rouge Park is comprised of approximately 45 km² of provincial and other public lands stretching from Lake Ontario at the Toronto - Pickering border to 16th Avenue in east Markham. The federal government owns another 55 km² of public Greenbelt land which stretches northward from the existing Rouge Park all the way into the heart of the Oak Ridges Moraine and eastward into the Duffins Creek watershed in Pickering.

These public lands provide an opportunity and responsibility to protect and restore habitat and water quality and contribute to the recovery of endangered species - expected 2012 GLWQA outcomes.

The Framework "How Much Habitat is Enough" was developed to inform habitat restoration within Great Lakes Areas of Concern (AOCs). According to this report:

"the framework provides guidance on the minimum habitat required to begin to support viable wildlife populations and should be seen as a starting point not a final goal."

This Framework was first prepared in 1998 by the Canadian Wildlife Service, Great Lakes 2000 Cleanup Fund, the Ontario Ministry of Natural Resources and the Ontario Ministry of the Environment. It was revised by Environment Canada in 2004 to incorporate the most current conservation science and notes:

"The guidelines are based on scientific literature and field studies concerning the amount of habitat required to provide for the ecological needs of fish and wildlife in wetlands, riparian areas and forested areas."

This federal report found that more than 30% forest cover and 10% wetland cover are needed for viable wildlife populations and watershed health. However, as the Toronto and Region Conservation Authority's (TRCA) 2007 Rouge Report Card reveals, the Rouge Watershed falls far short of these ecosystem health targets with only 13% forest cover and approximately 2% wetland cover. The TRCA's Rouge Report Card concludes:

"the current quantity, quality and distribution of natural cover are insufficient to provide long-term support for many of the native communities and species".

Within this context, it is understandable that Section 4.1.1.2 of the approved 2001 Rouge North Management Plan states:

"The overriding goal in creating the Little Rouge Creek Corridor is to establish a viable terrestrial corridor with interior forest habitat conditions.

Section 3.2.6 of the Provincial Greenbelt Plan (2005) gives strong legal support for this Rouge North Management Plan policy by stating:

"This Plan identifies a 600 metre wide corridor for the Little Rouge River as the main ecological corridor, between Lake Ontario and the southerly boundary of Oak Ridges Moraine Area, as well as several other Rouge River tributaries, in recognition of the longstanding commitment to establishing the Rouge Park." ... "In the case of a conflict between this Plan and the Rouge North Management Plan, the more restrictive policies apply."

The framework "How Much Habitat is Enough" further defines the necessary ecological corridor width by stating the:

"minimum forest width needed to create interior forest habitat conditions is 500 metres"

Given the existing public policy, scientific, ecological, Greenbelt, Rouge Park and Great Lakes context, the federal government and Parks Canada have a clear opportunity and responsibility to:

1. Create a Rouge National Park Study Area which includes the 100 km² public Greenbelt land assembly surrounding the Rouge River, Petticoat and Duffins watersheds;
2. Respect, strengthen and implement the laws, plans and public policies developed after many years of public planning and stakeholder consultation, including:
Great Lakes Water Quality Agreement and Toronto Remedial Action Plan;
Environment Canada's "How Much Habitat is Enough (2004)";
Provincial Greenbelt Plan (2005);
Rouge Park Management Plan (1994) and Rouge North Plan (2001);
Rouge River Watershed Plan (2007);
Duffins Creek and Carruthers Creek Watershed Plan (2003);
Fisheries Management Plan for Duffins Creek and Carruthers Creek (2004);
TRCA Terrestrial Natural Heritage System Strategy (2007);
Rouge Park Natural Heritage Action Plan (2008); and
Draft Fisheries Management Plan for Rouge River (2011).
3. Implement restoration of forests and wetlands on public Rouge River Park lands to:
 - a) fulfill GLWQA 2012 commitments and the conservation science recommendations of the 2004 Environment Canada Report "How Much Habitat is Enough";
 - b) buffer, inter-connect and restore mixed woodland and Carolinian forests and habitat for the 20+ federal species at risk within Rouge Park;
 - c) improve water quality, stream flow, fish habitat and aquatic health in local streams to improve Lake Ontario water quality, health and beaches;
 - d) Reduce runoff and costly pollution, flooding, erosion damage to downstream properties and infrastructure;
 - e) Create the 600 metre wide "main ecological corridor" outlined in the Greenbelt Plan, Rouge North Plan, Markham OPA 140 and the Rouge Natural Heritage Action Plan (2008).
4. Support the implementation of watershed and subwatershed plans, water budgets, source water protection plans, and habitat restoration action plans, to protect and restore local streams, improve water quality, reduce bacterial contamination of beaches, and protect source water areas like the Oak Ridges Moraine and its aquifer system.

Conclusion:

The Rouge National Park concept, legislation and plan should give priority to the protection and restoration of Carolinian and mixed woodland plain forests and wetlands within a sustainable natural heritage system which links Lake Ontario to the Oak Ridges Moraine with natural environment parklands.

This goal is consistent with Canada's national and international commitments to protect and restore habitat, biological diversity, endangered species and water quality within the Toronto Area of Concern and the Great Lakes basin.

Please give Parks Canada the mandate and resources to conduct a science-based public process which plans and implements a 100 km² Rouge National Park and links Lake Ontario to the Oak Ridges Moraine with forests, wetlands and natural environment public parklands.

Sincerely,



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& Director, Clean Production and Toxics

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