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September 14, 2012

The Hon. Peter Kent, Minister of the Environment  
Les Terrasses de la Chaudière, 10 Wellington Street  
Gatineau, Quebec K1A 0H3

Dear Minister Kent:

Rouge National Park

Thank you for the Canada Parks Agency's work to expand the national parks system. As you will recall, last year during Parks Canada's centennial, WWF recognized the agency's century of accomplishments as a *Gift to the Earth*, our highest accolade for conservation work of outstanding global merit.

Parks Canada is now taking steps to create Rouge National Park, on the north-eastern edge of Toronto, in a region which is home to several million Canadians. WWF commends the agency for this bold initiative.

Rouge National Park has the potential to:

- a) Protect and restore significant natural heritage in two of the most biologically diverse, threatened and under-protected life zones in Canada – the Carolinian and mixed woodland plain forest life zones;
- b) Connect urban dwellers and youth with nature and Canada's National Park system; and,
- c) Protect and restore natural heritage systems and ecological services, which support watershed, community and public health, as well as surrounding property values and prosperity.

In view of the public time, energy and resources already spent on Rouge park planning over the last 25 years, the legislation and Management Plan for Rouge National Park should respect, strengthen and implement the vision, goals and objectives of the Rouge Park Plans (1994 and 2001), Provincial Greenbelt Plan (2005), Rouge Watershed Strategy (2007), Rouge Natural Heritage Action Plan (2008), Toronto Remedial Action Plan, and TRCA Targeted Natural Heritage System Plan.

Specifically, WWF-Canada offers six recommendations calibrated to protect and restore a Rouge National Park of sufficient size and quality to adequately conserve the natural heritage for which it has been created. These recommendations are appended to this letter.

We wish Parks Canada the best in its work in the Rouge Park and wider watershed. For our part, WWF-Canada will continue to monitor and contribute to the process as it unfolds. Please do keep us abreast of developments and in this regard, I very much look forward to your response.

Sincerely,

Monte Hummel, O.C.  
President Emeritus  
WWF-Canada

c.c. Mr. Alan Latourelle, CEO, Parks Canada

Attachment: WWF-Canada Recommendations for Rouge National Park (3 pp.)

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## **WWF-Canada Recommendations for Rouge National Park**

### **1. Protect and Restore the National Ecological Biodiversity of the Rouge Watershed**

Despite its near urban location, Rouge Park provides habitat for approximately 20 federal species at risk, including Blanding's turtles, butternut trees and American ginseng. Rouge Park has 800 native plant species, 225 birds, 30 mammals, 20 amphibians and reptiles, and 50 fish species, including brook trout, salmon and nationally rare red-side dace.

Rouge Park is located within the Carolinian forest and mixed woodland plain forest zones of Canada. Although these life zones have the greatest biological diversity and the most endangered species in Canada, they have the fewest natural environment parks. They are dominated by private land ownership and humans land uses. Over 99% of Canada's Carolinian forests are gone. Majestic mixed woodland plain forests that once stretched from Windsor to Kingston are now fragmented into small woodlots that tend to lose species over time. WWF-Canada has worked to conserve this naturally-threatened region of the country since 1981.

**Recommendation 1:** WWF encourages Parks Canada to fulfill national and international commitments by protecting and restoring Carolinian and mixed woodland forests and wetlands within and around Rouge National Park. This will help to protect and restore biological diversity and species at risk within two of Canada's most endangered life zones. The protection and restoration of Rouge Park's natural heritage system, biological diversity and water resources should be given the highest priority in the Park Management Plan.

### **2. Capitalize on Opportunity to Create a 100<sup>+</sup> km<sup>2</sup> Rouge National Park**

A 100<sup>+</sup> km<sup>2</sup> public land assembly surrounds the Rouge and adjacent Petticoat Creek and Duffins River watersheds in Toronto, Markham and Pickering. Unfortunately, the current Park Study Area does not include federal lands in north Pickering which have already been designated as "natural heritage system" under the provincial Greenbelt Plan (2005). This public land offers a unique opportunity to create a Rouge National Park which is large enough to protect and restore a natural and cultural heritage system and sustain biological diversity with compatible public uses.

**Recommendation 2:** In an area with several million people and two threatened habitat zones of national significance, it would make sense and respect conservation science principles to include the 100<sup>+</sup> km<sup>2</sup> of public Greenbelt lands within the Rouge National Park, or at the very least, within the Park Study Area.

### **3. Employ Conservation Science and Public Policy on "How Much Habitat is Enough"**

A conservation science report called *How Much Habitat is Enough* was produced by Environment Canada in 2004, in cooperation with the Canadian Wildlife Service, Ontario Ministry of Natural Resources and Ontario Ministry of Environment. This report informs habitat restoration within Great Lakes Areas of Concern, like the Rouge River watershed and Park.



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This report found that more than 30% forest cover and 10% wetland cover are needed for viable wildlife populations and watershed health. According to the Toronto and Region Conservation Authority (TRCA) State of the Rouge Watershed report (2007):

- the Rouge Watershed currently has 13% forest cover and less than 3% wetland cover;
- "the current quantity, quality and distribution of natural cover are insufficient to provide long-term support for many of the native communities and species".

Section 3.2.6 of the Provincial Greenbelt Plan (2005) supports the Rouge North Management Plan and the *How Much Habitat is Enough* report by stating:

“This Plan identifies a 600 m 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.”

Section 4.1.1.2 of the approved Rouge North Management Plan (2001) states:

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

*How Much habitat is Enough* indicates that the minimum width of a forest with viable interior forest habitat is 500 metres. The legislation and Management Plan for Rouge National Park should respect, strengthen and implement the 600-metre Ecological Corridor approved in the Greenbelt Plan (2005) and Rouge North Management Plan (2001) and the targets of *How Much Habitat is Enough*, the Rouge Natural Heritage Action Plan, the Toronto Remedial Action Plan and the TRCA's Targeted Natural Heritage System.

**Recommendation 3:** A conservation science-based natural heritage system plan should be implemented without delay to ensure the "quantity, quality and distribution of natural cover" are sufficient to protect and restore native species communities and species at risk.

#### 4. Rouge Park Vision

The Rouge Park concept was developed 25 years ago at the grass-roots level through the "Save the Rouge" campaign. In January 1990, the House of Commons voted unanimously in support of a Rouge Park motion put forward by the Honourable Pauline Browes.

Between 1990 and 1994, the Ontario Ministry of Natural Resources led a public Rouge Park planning process. Municipal, provincial and federal agencies, First Nations, farmers, community and environmental groups, developers and many others were thoroughly engaged. The Rouge Park Management Plan and its vision, goal and objectives were adopted by the Ontario Government in 1994. Between 1997 and 2001, the Management Plan for Rouge Park north of Steeles was approved after another thorough public and stakeholder planning process. The 2001 Rouge North Plan adopted the vision, goal and objectives from the 1994 Plan.



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The approved 1994 and 2011 Rouge Park Management Plan Vision states:

*The Rouge Park will be a special place of outstanding natural features and diverse cultural heritage in an urban-rural setting, protected and flourishing as an ecosystem in perpetuity. Human activities will exist in harmony with the natural values of the park. The park will be a sanctuary for nature and the human spirit. The primary focus of the vision centres on the protection and appreciation of the park ecosystem.*

**Recommendation 4:** This existing, long-standing Rouge Park vision captures the public, agency and stakeholder comments received in multi-year planning processes over the last 22 years. This excellent vision should be adopted within the Management Plan for Rouge National Park.

## **5) Rouge Park Designation**

Rouge National Park is a nationally significant ecological area which should not, in our view, be mislabelled as an “Urban Park” or “People Park”. The draft Parks Canada name for the Rouge does not accurately project the natural habitat and wildland values which the public wants Rouge National Park to protect, restore and share.

The Toronto region already has a myriad of facilities and parks which provide a diversity of urban and people-oriented recreation, sport and leisure activities and programs. Rouge National Park activities and programs should give priority to the protection, restoration and appreciation of the park ecosystem and its native species and habitats.

**Recommendation 5:** “Rouge National Park” seems the most appropriate name, along with the long-standing motto “Wild in the City”. This title reflects the national importance of the natural habitat of this Park, its near-urban setting and its management by Parks Canada.

## **6) Rouge National Park Legislation and Planning**

Rouge National Park will involve challenges and opportunities in many realms: ecological, hydrological, infrastructure, agricultural, carrying capacity, public use and classification. These challenges and opportunities should be rationally and scientifically addressed during the public planning process needed to create the Park Management Plan.

**Recommendation 6:** The legislation and Management Plan for Rouge National Park should be developed through a thorough public and stakeholder planning process, under the leadership of Parks Canada. The legislation and Management Plan should give priority to the protection and restoration of a large mixed woodland plain and Carolinian forest natural heritage system which Links lake Ontario to the Oak Ridges Moraine and protects and restores biological diversity, ecological health, water quality and stream flow.