



July 9, 2019

The Honourable Catherine McKenna, PC, MP  
House of Commons, Ottawa, Ontario, Canada, K1A 0A6

**Re:** Rouge National Urban Park (RNUP) Management Plan  
Urgent Need to Implement Pre-existing Rouge Park, Watershed and Green Space Plans

**Dear Minister Catherine McKenna:**

Parks Canada's Rouge National Urban Park (RNUP) Management Plan is currently negligent. It disregards existing remedial action plans and Environment Canada's recommendations for improving Great Lakes Water Quality, public health and habitat for species at risk. It neglects the forest and wetland restoration required in existing remedial action plans for effectively combating escalating liabilities from pollution, climate change, urban growth and flooding. **If Parks Canada continues to delay forest and wetland restoration on public lands in RNUP, the cost for GTA taxpayers will be an estimated \$100 million per year from unabated pollution, climate change and flooding; and reduced watershed, ecosystem and public health.**

Since Parks Canada's involvement, the rate of forest and wetland restoration in RNUP has fallen by 80%, despite a \$16 million park budget increase. The RNUP Management Plan proposes to continue this slow and costly approach. If this continues, it will take 130 years to implement twenty-five year remedial action plans. Instead, Parks Canada should be aiming to increase forest and wetland cover in RNUP from approximately 38% today, to 43% by 2024, 50% by 2029, and 60% by 2044. Since approximately 50% of the park is not currently leased for farming, this restoration can occur while reasonably accommodating private leases on public lands in RNUP.

Scientific research and the Insurance Bureau of Canada's report "Combating Canada's Rising Flood Costs" confirm that wetland and forest restoration is a cost-effective way to mitigate pollution, climate change and flooding. Contrary to these scientific findings and the declaration of a climate emergency by Canada, the RNUP Management Plan proposes to delay or "avoid" the implementation of pre-existing forest and wetland restoration plans on public lands.

The RNUP Management Plan also disregards the legal imperatives outlined by the Canadian Environmental Law Association (Attachment 1) and the following scientific input provided to you by Dr. Mandrak, a scientist and University of Toronto professor (Attachment 2):

*"Environment Canada's recommendations for more than 60% forest and wetland cover were largely incorporated within existing Rouge Park, Watershed and Federal Green Space Master Plans ... The timely implementation of these existing conservation recommendations and plans is essential to address federal mandates under the RNUP Act, Great Lakes Water Quality Agreement, Paris Climate Change Accord, and ... Convention on Biodiversity."*

Contrary to these federal laws and public mandates, the RNUP Management Plan refers to the avoidance of the 2,000 hectares of forest and wetland restoration required by these science-based, due diligence, remedial action plans. These existing remedial action plans were created after decades of expensive public, stakeholder and government reviews, and approvals.

**Honourary  
Friends**

Lois James, "Save the Rouge" founding member and Order of Canada Recipient, posthumous

Paul Harpley, "Save the Rouge" founding member

Hon. Raymond Cho  
MPP Scarborough North

Hon. David Peterson,  
former Ontario Premier

Gerry Phillips, former  
MPP Scarborough  
Agincourt

Alvin Curling, former  
MPP Scarborough  
Rouge River

Derek Lee, former MP  
Scarborough Rouge  
River

Rathika Sitsabaiesan,  
former MP Scarborough  
Rouge River

Joyce Trimmer, former  
Mayor of Scarborough,  
posthumous

Bobbi Hunter, founding  
member of Greenpeace  
Executive



The latest report from the United Nations Intergovernmental Panel on Climate Change recommends 1 billion hectares of forest restoration to help avoid climate chaos.

For the southern half of RNUP, the unanimously approved 2008 Rouge Park Natural Heritage Action Plan (Attachment 4) required 694 hectares of forest and wetland restoration to achieve 60% forest and wetland cover by 2016. As of 2019, less than half of this restoration has been completed. For most of the northern half of RNUP, the 2003 Draft Federal Green Space Lands Strategy (Attachment 5) delineated an increase in forest cover to more than 52%. Sixteen years later, forest cover is still less than 20% on federal public lands in RNUP's northern half.

### **Responsible Public Land Management Requires Prompt Implementation of Remedial Plans**

If Parks Canada further delays forest and wetland restoration on public lands in RNUP, it will violate the legal, planning and scientific requirements for urban growth approvals in the Rouge, Petticoat and West Duffins Watersheds. Parks Canada will expose Canadians and all government levels to costly environmental, legal and financial consequences, contrary to Treasury Board Directives on responsible and environmentally sustainable public land management.

The Toronto and Region Conservation Authority (TRCA) and its 2018 Living City Report Card, acknowledge that the GTA is falling short of remedial action plan requirements for combating climate change and flooding; improving water quality and public health; and protecting biodiversity. The Toronto and Region Conservation Authority (TRCA) website states:

*Decades of urban development have resulted in harmful changes that exceed the carrying capacity of natural systems in the Rouge River watershed. These changes include increased surface runoff, more water pollution, ... increased erosion and sedimentation, channel instability, and loss of biodiversity. ... the ability of the land and water to absorb the negative impacts of human activities... cannot be sustained ... unless fundamental changes are made.*

Consequently, additional urban growth is contingent on this fundamental change - the timely restoration of forests and wetlands, particularly on public lands in RNUP. Timely forest and wetland restoration was deemed necessary to absorb the additional pollution and runoff (stormwater) generated by urban growth and climate change. In flagrant violation of this "due diligence" requirement, urban growth is proceeding while forest and wetland cover has not increased by even 1% in the Rouge Watershed over the last decade.

When governments fail to implement "due diligence" plans, there are costly consequences. The Walkerton tainted water tragedy led to six deaths and more than \$78 million in public liability costs. In 2014, the Credit Valley Conservation Authority released a report "Stormwater Management: Legal Issues in a Changing Climate" which states:

*"since all orders of government can be sued for negligence in relation to their operational decisions, each order of government has a strong incentive to consider its existing procedures and systems in light of new information, including ... climate change."*



## **Treasury Board Directives Require Transparency, Fair Market Value and Best Taxpayer Value**

Parks Canada needs to conduct a thorough and transparent public review of the private leases on RNUP public lands, the leasing process, and the necessary conditions for implementing forest and wetland restoration, and ensuring ecologically compatible farming and fair market value. To obtain best taxpayer value, this thorough and transparent public review must be completed prior to the approval of long private leases on public lands in RNUP.

In the past, approximately half of the public lands in RNUP have been leased, without a transparent and competitive bidding process, to tenants who mainly grow field corn and soybeans. This cash cropping utilizes pesticides and fertilizers which can harm water quality, people, pollinators, and wildlife. Most of these cash crops are destined for fuel additives, export and cattle feed - not local food.

FRW supports fair leases of reasonable lengths on approximately 40% of the public lands in RNUP for local heritage farmers who are willing to transition to ecologically compatible farming. However, many subsidized leases in RNUP have been granted to a few well-connected people, without a fair, transparent and equitable process. Approximately half of RNUP public lands have been leased for just \$40 to \$80 per acre. This annual lease rate is about one-third of the average fair market value (\$120 to \$240 per acre) for leasing privately owned farmland with similar productivity. Canadian taxpayers and farmers on private lands will be unfairly disadvantaged, if Parks Canada continues such highly subsidized leases on public lands in a national park.

A 2017 Natural Capital Report by the TD Bank and Nature Conservancy of Canada valued Carolinian Forests in southern Ontario at nearly \$20,000 per hectare. A report commissioned by the Ontario Government "Estimating Ecosystem Services in Southern Ontario, 2009" obtained similar results. This report calculated the following natural capital values for the land uses below, based on their contribution to mitigating climate change and flooding impacts, protecting air and water quality, and protecting watershed, ecosystem and public health:

Urban Wetlands:	\$ 161,420 per year per hectare (1 ha = 1.7 soccer fields)
Urban Forests:	\$ 25,853 per year per hectare
Cash Crop Lands:	\$ 291 per year per hectare

Forests and wetlands have a public natural capital value which is some 60X to 400X more than the average private profit (\$400/year/ha) generated by leased cash crop lands. To obtain best value for taxpayers, the Federal Government and Parks Canada have a clear responsibility to promptly implement pre-existing Rouge Park, Watershed and Federal Green Space remedial action plans for restoring forest and wetland cover to at least 60% in RNUP.



## Conclusion:

Urban growth and climate change are increasing pollution, stormwater and flooding. To combat these escalating liabilities, the Federal Government and Parks Canada have a clear responsibility to promptly implement pre-existing Rouge Park, Watershed and Federal Green Space remedial action plans for restoring forest and wetland cover to at least 60% in RNUP. According to the Environment Canada 2013 report "How Much Habitat is Enough" at least 60% forest and wetland cover is necessary for ecological integrity - the legislated priority of RNUP.

If Parks Canada extends private leases for too long on too much public land in RNUP, remedial action plans will be blocked or delayed. Public lands would then be frozen in long private leases, creating large "No Trespassing" and "No Nature" zones in a national park.

The 2008 Rouge Park Natural Heritage Action Plan delineated approximately 75 hectares of ecological restoration each year. Given the escalating climatic and ecological crises we face, and the huge increase in the park budget, Parks Canada should restore forest and wetland habitat at an average rate of 80 hectares per year in RNUP. At this rate, existing Rouge Park, Watershed and Federal Green Space remedial action plans will be implemented within 25 years.

The full implementation of existing remedial action plans, including the Greenbelt and Rouge Park "main ecological corridor(s)", will leave approximately 40% of the park's public lands available for private farming leases beyond 2045. This constitutes a generous accommodation of private leases on public lands in a national park in Canada's most populous and under-protected region - the Carolinian Forest Zone of Southern Ontario.

FRW looks forward to collaborating with Parks Canada, farmers, other stakeholders, and the public, to find fair and cost-effective ways to prioritize ecological integrity while promoting a vibrant farming community within and surrounding Rouge National Urban Park.

Since we share common environmental goals and public interests, we trust that you will invite FRW to work collaboratively on the RNUP Advisory Committee. By harnessing the accumulated knowledge, community support and ecological expertise of FRW, Parks Canada can implement effective management plan strategies for RNUP.

FRW looks forward to a written response to the issues and recommendations outlined in this letter. We hope to meet with you and Parks Canada representatives in the next several weeks.

Sincerely,

Jim Robb, for FRW, 647-891-9550



## Attachments:

1. Canadian Environmental Law Association 2018 letter on RNUP Management Plan
2. Dr. Mandrak 2018 letter on the RNUP Management Plan
3. FRW 2018 letter on the RNUP Management Plan
4. Rouge Park 2008 Natural Heritage Action Plan (page 9)
5. Federal Green Space Lands 2003 Draft Master Plan and Implementation Strategy (page 20)
6. Federal Candidate Responses in 17 GTA Ridings in 2015 to RNUP Questions

## Partial List of Letter Recipients:

Parks Canada: Daniel Watson, Carol Sheedy, George Green, Pam Veinotte, Trevor Swerdfager, Thao Pham, Michael Nadler, Mitch Bloom, Rob Prosper, Omar McDadi, Scott Back, Peter Feldman, Sheryl Santos, Jeffrey Sinibaldi, John Viengkone, Julia Phillips

MP Scarborough-Rouge Park	Gary Anandasangaree
MP Quadra	Hon. Joyce Murray (Treasury Board President)
MP Scarborough-Southwest	Hon. Bill Blair
MP Scarborough-North	Shaun Chen
MP Scarborough-Guildwood	John McKay
MP Scarborough-Centre	Salma Zahid
MP Scarborough-Agincourt	Jean Yip
MP Pickering-Uxbridge	Jennifer O'Connell
MP Ajax	Mark Holland
MP Beaches-East York	Nathaniel Erskine-Smith
MP Toronto-Danforth	Julie Dabrusin
MP Markham--Thornhill	Mary Ng
MP Richmond Hill	Majid Jowhari
MP King Vaughan	Deb Schulte
MP Saanich Gulf Islands	Elizabeth May
MP Burnaby South	Jagmeet Singh
MP Rosemont La-Petit-Patrie	Alexandre Boulerice
MP Kootenay Columbia	Wayne Stetski
MP Regina Qu'Appelle	Andrew Scheer
MP Milton	Lisa Raitt
MP Abbotsford	Ed Fast

*Giving Nature a voice and a helping hand*  
2259 Meadowvale Road  
Scarborough, Ontario  
M1X 1R2

Web site: [www.frw.ca](http://www.frw.ca)  
Telephone: (416) 208-0252