

Nov. 29, 2022

PARKS CANADA'S TECHNICAL RESPONSE TO THE PROPOSED DEVELOPMENT OF GREENBELT LANDS ADJACENT TO ROUGE NATIONAL URBAN PARK

Parks Canada herein presents considerations for the Government of Ontario in regards to the proposal to remove 7,400 acres of protected lands from the Greenbelt in the Greater Toronto Area (GTA), particularly lands in and around Rouge National Urban Park (see Figure 1). Should these lands be removed from the Greenbelt and developed as proposed, Parks Canada's analysis suggests that there is a probable risk of irreversible harm to wildlife, natural ecosystems and agricultural landscapes within Rouge National Urban Park thereby reducing the viability and functionality of the park's ecosystems and farmland.

The provincially-protected Greenbelt lands immediately adjacent to Rouge National Urban Park provide important habitat (nesting areas, breeding grounds, overwintering locations) and ecological connectivity to critical habitat for dozens of species at risk, as well as vital ecosystem services for nature, water and agriculture. They are also critical to the health and function of Rouge National Urban Park, which has a mandate to protect natural, cultural and agricultural heritage landscapes. As the Provincial Government is well aware, the Greenbelt lands, along with Rouge National Urban Park, together contribute to the ecological connection between the Oak Ridges Moraine and Lake Ontario – the only intact, contiguous connection between the two in the entire Greater Golden Horseshoe.

The importance of these lands was underscored in the *Memorandum of Agreement (MOA) between Ontario and Parks Canada Respecting the Establishment of Rouge National Urban Park*, a document which continues to be in force. Ontario committed in this agreement, particularly section 2.09, to consult with Parks Canada if any changes are proposed to any applicable provincial policies, including the *Greenbelt Plan*. Additionally, some of the "Other Lands" identified in the *MOA* in which Parks Canada has an interest are part of the Duffins Rouge Agricultural Preserve in the Greenbelt. Ontario has verbally committed to transferring some of these "Other Lands" to Parks Canada in years past. It is our opinion that, to date, the province has not met the consultation requirement of this *MOA* as the Province has not yet reached out to discuss these matters with Parks Canada.

Of specific concern to Parks Canada are Greenbelt lands immediately adjacent to Rouge National Urban Park, also known as the Duffins Rouge Agricultural Preserve, which border the Townline Swamp Wetland Complex (henceforth "the Complex"), located in the Pickering area of Rouge National Urban Park. The Complex is arguably the most ecologically-sensitive area of the national urban park and is home to dozens of federally and provincially endangered and threatened species, including Bank Swallow, Eastern Meadowlark, Wood Thrush, Red-headed Woodpecker, Monarch Butterfly and several species of bats, as well as other rare species.

As in the opinion of Parks Canada the consultation requirement surrounding these changes has not yet been met by Ontario, Parks Canada would like to highlight for discussion the following

as risks we have identified, and requests an opportunity to meet and discuss these items at the earliest opportunity:

1. The ecological integrity of the Complex near the park's boundary is very sensitive to human disturbance and is identified as "critical habitat" for the Blanding's turtle, a threatened species under the federal *Species at Risk Act*. Since 2014 and in collaboration with First Nations partners, the Toronto Zoo and the Toronto and Region Conservation Authority, Parks Canada has reintroduced more than 500 threatened Blanding's turtles into this general area of the park. While turtles are released in Rouge National Urban Park, these species move in an unrestricted fashion between the park and the adjacent Greenbelt lands. The Greenbelt changes as proposed appear to create additional barriers to suitable critical habitats within the Park hence negatively impacting these species at risk.
2. The land use and cover changes that would accompany the proposed development could result in habitat fragmentation that would be expected to have a cascading effect on the quality of habitat in Rouge National Urban Park. For example, hydrologic changes caused by habitat fragmentation generally reduce species richness and abundance of plants, macroinvertebrates, amphibians, and birds with greater numbers of invasive and exotic species. Possible reduction in soil saturation and lowered water tables may result in greater nitrogen mineralization and nitrification in urban wetlands with higher probability of nitrate export from the watershed. The land use changes to these complementary landscapes noted above may also increase the likelihood of flooding in this part of the GTA, and may also impact the salinity of the surrounding watershed. All of these potential impacts to Rouge National Urban Park are of concern to Parks Canada as they have the potential to significantly compromise the viability of park ecosystems and farmland, and the Wetland in particular.
3. Rouge National Urban Park is the only Parks Canada site in the country with a mandate to protect agricultural landscapes. The park includes large tracts of Class 1 farmland, which is the rarest, richest and most fertile in the country. The proposed development may negatively impact the maintenance of a vibrant and viable agricultural community within the Rouge National Urban Park and in this part of the Greenbelt. Along with the local farming community, the government of Ontario was one of the most significant contributors to the agricultural vision for Rouge National Urban Park and identified that a vibrant farming community requires dedicated agricultural land inside and outside of the park in order to be economically viable.
4. As a foundational practice in the administration of Rouge National Urban Park, Parks Canada works closely with 10 First Nations communities – via the Rouge National Urban Park First Nations Advisory Circle – with a historic, cultural and present day connection to the Rouge Valley on all aspects of park planning and development. The First Nations Advisory Circle consists of: the seven Williams Treaties First Nations (Mississaugas of Scugog Island First Nation; Hiawatha First Nation; Alderville First Nation; Curve Lake First

Nation; Chippewas of Georgina Island First Nation; Chippewas of Rama First Nation; Beausoleil First Nation) as well as the Mississaugas of the Credit First Nation, the Six Nations of the Grand River, and the Huron-Wendat Nation. We wish to support this Advisory Circle in outlining Parks Canada's understanding that the adjacent Greenbelt lands are of strong interest to many Indigenous Peoples, including the Mississaugas of the Credit First Nation, who have submitted a land claim for unextinguished title (the Rouge River Valley Tract Claim) on lands that overlap the boundaries of Rouge National Urban Park and the Duffins Rouge Agricultural Preserve Greenbelt lands.

In closing, we request a meeting with the province, in line with section 2.09 in the *Memorandum of Agreement (MOA) between Ontario and Parks Canada Respecting the Establishment of Rouge National Urban Park*, to discuss the Greenbelt land removal and development proposal at your earliest convenience.

Sincerely,

A handwritten signature in black ink, appearing to read 'Omar McDadi', written in a cursive style.

Omar McDadi

*Field Unit Superintendent, Rouge National Urban Park
Directeur d'unité de gestion, parc urbain national de la Rouge
Parks Canada | Parcs Canada*

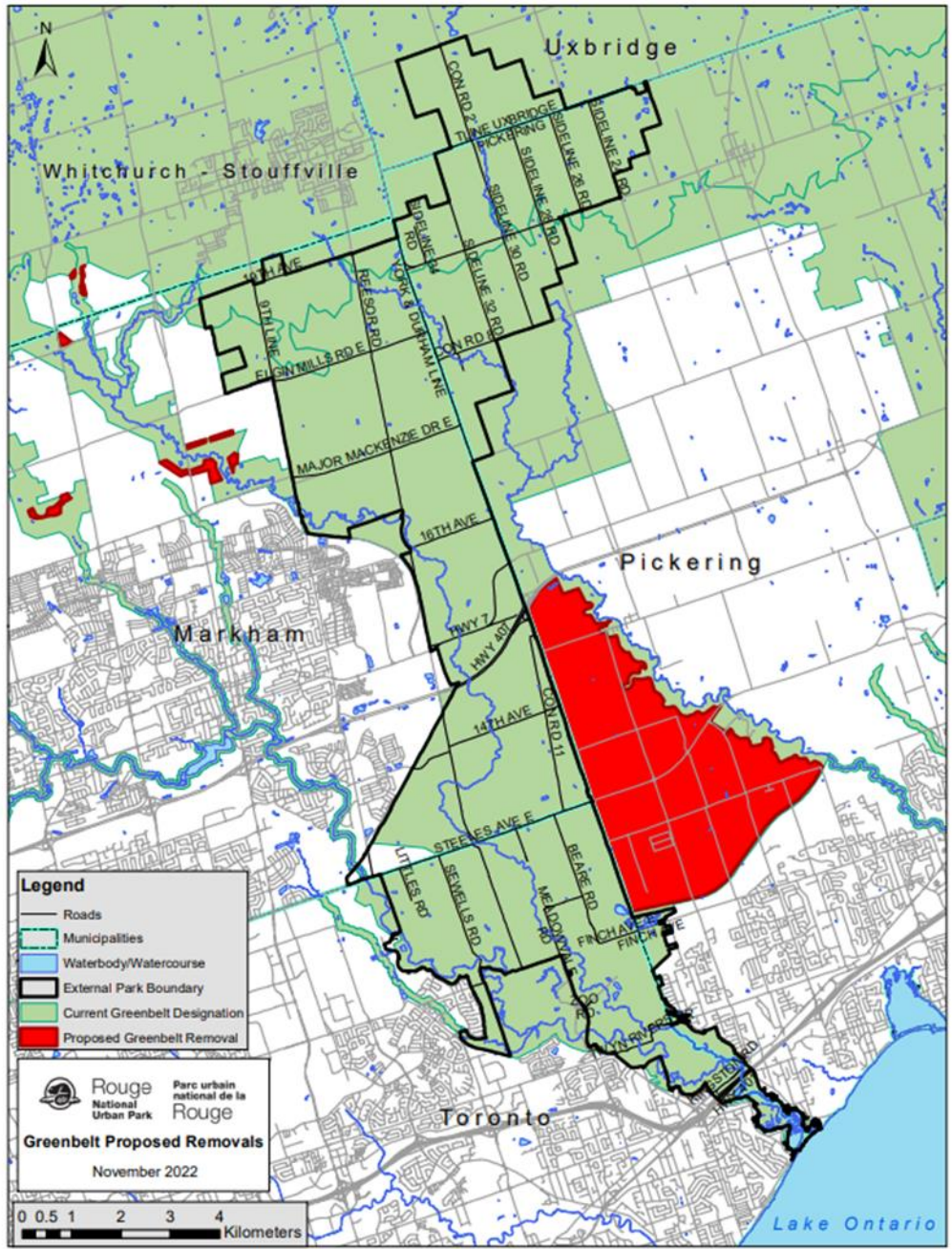


Figure 1. Lands proposed to be removed from the Greenbelt (in red). The large area in red are Greenbelt lands known as the Duffins Rouge Agricultural Preserve Greenbelt, a protected area that is complimentary to Rouge National Urban Park.