

September 7, 2012

Pam Veinotte,  
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By email: [pam.veinotte@pc.gc.ca](mailto:pam.veinotte@pc.gc.ca)

Dear Ms. Veinotte:

Congratulations on your appointment as Superintendent of Canada's first National Urban Park. We look forward to working with you on this exciting project.

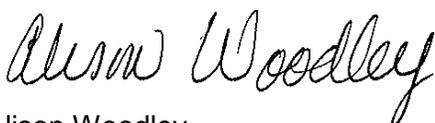
CPAWS strongly supports the creation of the Rouge National Urban Park. The Rouge National Urban Park is a unique opportunity to conserve an important urban ecosystem, and provide millions of Canadians with a chance to directly experience and connect with nature. It is also a gateway to introduce them to Canada's magnificent protected areas system.

We appreciate the significant public outreach and consultation that Parks Canada is undertaking in developing the Rouge National Urban Park concept. As Canada's first National Urban Park, it is important to get the concept "right" not only to ensure the future of the Rouge, but also because this project will be a model for a new category of Canadian protected area that will hopefully expand to other urban centres over time.

Our main comment about the current proposed Park Concept is that it needs to more clearly prioritize conservation. The park concept and subsequent legislation and policy should make it clear that other important management goals, such as connecting people to nature, must happen in a way that does not compromise this overarching conservation goal. This approach will not diminish the important role of the Rouge in connecting urban Canadians with nature. On the contrary, we believe that clearly prioritizing ecosystem health is essential to both protect the significant ecological values of the Rouge AND to provide opportunities for people to connect people with nature in the long term. And it will help provide a clear focus for park managers, partners and stakeholders as to how this should be accomplished.

Our detailed comments and recommendations on the park concept are attached. We would be pleased to discuss this with you in more detail.

Sincerely,



Alison Woodley  
National Conservation Director, CPAWS

cc. Andrew Campbell, Vice President, External Relations and Visitor Experience, Parks Canada  
Louis Lavoie, Manager, External Relations, Parks Canada

## **CPAWS Comments on the proposed Park Concept for the Rouge National Urban Park**

### ***Summary:***

Our overarching recommendation about the proposed Park Concept is that it needs to much more clearly prioritize conservation as the priority management goal. Other important management goals, such as connecting people to nature, should only happen in a way that does not compromise this overarching conservation goal. Clear prioritization of ecosystem health in policy and legislation will ensure that the park is able to conserve the significant natural values of the Rouge for future generations AND ensure urban Canadians have the opportunity to engage with, and experience this natural heritage in the long term. Without this clear prioritization of conservation in the legal and policy framework, the park risks being "loved to death" over time.

Prioritizing conservation in the Rouge National Urban Park is consistent with Parks Canada's mandate; with the management direction of the Rouge Park over the past decade; as well as with the internationally recognized IUCN definition of a protected area which requires that the conservation of nature be the primary management objective in order to qualify as a protected area.

Given the Rouge National Urban Park's location in the midst of a large urban centre where demands and pressures on the park will be enormous, achieving success in protecting and restoring ecosystem health will also depend on ensuring adequate resources are allocated for science, including ecological research and monitoring, to guide and track the success of management actions. It is also important to ensure the park is large and contiguous enough to achieve its ecological goals, including ensuring a functional ecological connection between Lake Ontario and the Oak Ridges Moraine.

### ***About CPAWS***

CPAWS is Canada's voice for wilderness. Since 1963 we've been instrumental in creating over two-thirds of Canada's protected areas. Our vision is that Canada will protect at least half of our public land and water. As a national charity with 13 chapters, 40,000 supporters and hundreds of volunteers, CPAWS works collaboratively with governments, local communities, industry and indigenous peoples to protect our country's amazing natural places. We're also on guard to ensure that our parks are managed to protect the nature within them.

### ***Respecting the legacy of the Rouge:***

The Rouge Park is a significant ecosystem in Canada's largest urban centre. It contains a rare Carolinian forest, is home to over 1,000 species of plants and animals, including 23 species at risk, and provides an important ecological connection for wildlife between the Oak Ridges Moraine and Lake Ontario. The area also has a rich cultural heritage, important to Aboriginal peoples and to European settlers whose legacy of farming continues in parts of the Rouge today.

The Rouge National Urban Park was made possible by the efforts of dedicated local citizens who, for decades, fought to save the Valley from urban sprawl, and the Ontario provincial government who responded by creating the present-day 47-square-kilometre Rouge Park. As responsibility for the Rouge passes to Parks Canada, it is important that the management model reflect the ecological significance of the area, and honour the legacy of the citizens who fought to protect the Rouge, and made this park possible. While the Park Concept highlights the need

to respect this legacy right up front, the document, including the vision, management guidelines and overall tone should more strongly reflect the focus on conservation and stewardship outlined in the existing Rouge Park management and other plans.

### ***Prioritizing ecological health***

As the Rouge Park transitions to a National Urban Park, Parks Canada can ensure this conservation legacy is respected by making the conservation of ecosystem health the overarching management priority.

The Rouge is to be Canada's first ever national urban park. As such, it must set a sound legal precedent for what a national urban park should look like. In urban settings, the demands and pressures on remnants of nature are enormous, and having a clear priority on protecting and restoring ecosystem health will help guide park managers, stakeholders and partners in determining the kinds of activities that should be encouraged and allowed. Clarity that ecosystem health is the management priority will also distinguish National Urban Parks from other parks and recreation areas in urban environments.

The broadly accepted international definition of a protected area makes clear that conserving nature needs to take priority to be considered a protected area, and that other important benefits and values, such as the protection of ecosystem services and cultural values have to be compatible with this overarching nature conservation goal.

*“A protected area is a clearly defined geographical space, recognised, dedicated and managed, through legal or other effective means, to achieve the long term conservation of nature with associated ecosystem services and cultural values.”<sup>1</sup>*

IUCN further clarifies that *“only those areas where the main objective is conserving nature can be considered protected areas; this can include many areas with other goals as well, at the same level, but in the case of conflict, nature conservation will be the priority”<sup>2</sup>*;

The Rouge National Urban Park Concept should make clear that the proposed park will be in line with this definition and ensure nature conservation takes priority over the other important goals and values that will be included in the park.

As one of the best examples of Carolinian forest and one of the last intact watersheds in the Western Lake Ontario basin, the natural heritage of the Rouge is irreplaceable. This further reinforces the need to be clear when there is a potential conflict between nature and other cultural or economic interests, conservation of natural heritage should be prioritized.

It's important to note that prioritizing ecosystem health does not diminish the value of National Urban Parks in connecting people with nature. To the contrary, it will, in our view, encourage a focus on activities that provide educational and other experiences, such as stewardship and restoration activities, which will most effectively and profoundly connect people with nature, and contribute to building a culture of conservation in Canada. And it will help prevent National Urban Parks from being “loved to death” over time. By prioritizing ecosystem health and conservation, we'll ensure generations to come can still learn about, appreciate and enjoy the natural wonders of the Rouge.

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<sup>1</sup> Dudley, N. (Editor) (2008). *Guidelines for Applying Protected Area Management Categories*. Gland, Switzerland: IUCN. 86pp.

<sup>2</sup> Ibid

Currently, the Park Concept is not clear enough on this prioritization, and the tone appears to emphasize visitor engagement over conservation.

For example:

- The vision should make clear that ecosystem health is the priority management goal
- The section on “Conserving Natural Heritage” should be moved forward and given more prominence.
- The Guiding Principle related to ecological health should be tightened up, as the reference to “scientific integrity” doesn’t have any clear meaning. Instead we suggest it be replaced with a clear goal statement about protecting and restoring ecosystem health as the management priority, along with a guiding principle that management should be based in science and traditional knowledge, with ecological and social research and monitoring informing management planning and decision-making.

We further recommend that for the purpose of clarity and common understanding, Parks Canada reiterate IUCN’s clear statement at the beginning of the Park Concept document saying “*in the case of a conflict, nature conservation will be the priority*”.

### ***Proposed 10 year Management Goals***

CPAWS recommends that Parks Canada should set goals for the next 10 years for Rouge National Urban Park of:

- Conserving the Rouge’s natural heritage through improved ecosystem health, including restoration of species at risk
- Putting in place a strong science-based research and monitoring system to guide management actions to maintain and restore ecosystem health;
- Engaging thousands of people, building on the established volunteer base, in appreciating and learning about nature, monitoring and restoring ecosystem health, learning about the broader national parks system, and respecting the need to tread lightly in the Rouge National Urban Park to ensure its future health .

### ***Ecosystem Health vs. Ecological Integrity***

We support using the concept of ‘ecosystem health’ as a priority for the Rouge and other potential Urban Parks rather than ecological integrity because we understand ‘ecological integrity’ has a precise meaning under the Canada National Parks Act, that is unlikely to be achievable in the Rouge. If the EI concept is used in urban parks, the meaning of this concept in the context of large wilderness parks could be inadvertently diminished.

The Rouge, as healthy and diverse as it is relative to the surrounding landscape, is a long way from having ecological integrity, and CPAWS accepts that it is not practical or possible to fully restore this integrity, at least in the foreseeable future. For example, it is likely not practical or possible to reintroduce long extirpated space-demanding species or a full suite of predators. However, much can be done in the Rouge, and the park management framework should clearly prioritize the protection and restoration of ecosystem health to the maximum degree possible, within the context of the urban environment.

In the context of the Rouge, ecosystem health protection and restoration means maintaining the existing physical, biodiversity and process elements of the Rouge ecosystem, and restoring those that are possible over time.

## ***Visitor Activities***

The Park Concept mentions on page 8 that recreational uses should be consistent with the long term conservation of the park, which is important and a welcome statement. We suggest that the park should focus primarily on encouraging education and stewardship activities that help protect and improve the park's ecosystem health, and are effective in connecting people with nature, such as volunteer restoration and monitoring programs, rather than on a broad suite of recreational activities widely available in other places in the city.

Clearly prioritizing nature conservation, and specifically ecological health, will help to clarify what types of activities are appropriate in the park, providing more certainty and potentially reducing on-going conflict over appropriate use.

Encouraging education, stewardship and volunteerism as a primary focus for visitor activities would respect and build on the current Rouge Park initiatives which have already successfully engaged over 7500 people in these kinds of activities.

Special events, community outreach and private programs and events that are proposed for the park should only be supported if they are compatible with the priorities of ecosystem health and with connecting people with nature.

Also, the park should focus only on experiences that rely on the intrinsic natural values of the park, rather than on those that rely primarily on infrastructure. Activities that expand the developed footprint, create excessive noise or degrade the natural environment should not be allowed.

## ***Infrastructure***

In order to maintain and enhance the ecological health of the Rouge, energy efficient and nature-friendly modes of transportation should be encouraged for travel to and within the park. Public transportation, biking and walking should be encouraged over personal motor vehicles.

Existing transportation, energy, water, sanitary and other infrastructure should be included within the Park, where possible, so they can be managed for mitigation of negative effects on ecosystem health and restoration. Parks Canada staff should work closely with the relevant entities responsible for infrastructure (companies, municipalities etc) to accomplish this.

No additional infrastructure footprint should be permitted within Rouge Park. Any new infrastructure should be constrained to stay within the current physical and functional infrastructure footprint. Over time, the infrastructure footprint should be reduced where possible.

## ***A People's Park?***

CPAWS is of two minds about the idea of the Rouge as a 'people's park'. Clearly the Rouge, because of its proximity to the largest urban area in Canada, is ideally situated to connect a large number of people with nature, and that opportunity should be embraced.

On the other hand, if labelling the Rouge as a "People's Park" gives the perception that humans and human activity are the top priority for park management, then neither ecosystems nor people in the end will be well served. Clarity on the need to prioritize conservation is important.

The matrix of land uses surrounding the Rouge are, for the most part, devoted to human activity and there is no shortage of opportunities for recreational or other activities in the Greater Toronto Area. Sending a message that the Rouge National Urban Park can be “all things to all people” will likely result in the park being ‘loved to death’, and its unique natural values and the opportunity for people to experience these values, diminished.

### ***Strong Science Capacity for Monitoring and Management***

Successful ecosystem protection and restoration requires strong science capacity for long term research and monitoring. Baseline data must be collected to understand the current state of ecosystem health, and an ecological monitoring program, integrated within an adaptive management system, is needed to guide management actions, mitigate impacts, and track progress towards ecosystem goals. Parks Canada has the necessary expertise to implement a strong science based approach to managing the Rouge, based on the existing national park monitoring and restoration guidelines. We are concerned, however, about the recent reductions to science capacity in the Agency. Emphasizing a commitment to science –based management in the Park Concept , legislation and management plan will reinforce the importance of this approach, and the need for resources to support it.

### ***Park Boundary***

When planning for protected areas, bigger is generally better to support ecosystem health. Small parks are much more difficult to manage for ecosystem health than larger ones. The study area would be significantly improved by adding the federal Greenbelt lands to the north of the current Rouge Park, as it would provide better functional ecological connectivity from Lake Ontario to the Oak Ridges Moraine. If this is not possible at this time, the proposed study area would be the absolute minimum that should be included, and should encompass the most contiguous configuration possible. If this is the case, the federal Greenbelt lands need to be kept free of urban development through an alternate legal mechanism that would protect them as green space in the long term, and should be explicitly referenced in the Rouge legislation as a vital part of the Greater Park ecosystem.

### ***Legislation***

New legislation for the Rouge should follow the example set by recent leading parks legislation in Ontario (Provincial Parks and Conservation Reserves Act) and the Canada National Parks Act, both of which prioritize conservation. In a similar way, the legislation for the Rouge should enshrine ecosystem health as the priority goal of the park.

The legislation should also require consideration of the greater park ecosystem. This will be particularly important in an urban context where Parks Canada will have to work within its powers and influence with the Ontario Government and surrounding municipalities and landowners to ensure that activities outside the park do not degrade ecological health within the park. Making this explicit in the legislation will help support this work.

If the Federal Greenbelt lands to the north of the current study area are not to be included in the Rouge National Urban Park at this stage, the Rouge Legislation could officially enshrine these as Federal green space so they are a buffer to the Rouge National Urban Park and support the park’s conservation goals. Our strong preference is for the ecological health of the park is to include these lands at this time.

Aquatic ecosystems are at the heart of the Rouge. The park concept document reflects the importance of protecting these aquatic ecosystems. To enable their conservation and management as part of the park, it will be important that these aquatic ecosystems be transferred to the jurisdiction of Parks Canada, and managed under the park legislation as they are in national parks. The Rouge legislation should include the same level of protection for aquatic systems as included in the National Parks Act.

## **Conclusions**

If the Rouge National Urban Park is to fulfill the vision of the people who laid the groundwork for its establishment and its precedent setting position as the first of its kind in Canada, it is important that the Park Concept, Legislation and Management Plan are done right. In summary CPAWS recommends the Park Concept clearly address the following key points:

- The priority management goal for the park should be maintaining and restoring its ecosystem health. Within this framework the park should focus on encouraging people to connect to nature.
- Success requires a strong, well-resourced scientific research and monitoring program.
- To distinguish National Urban Parks from other urban parks, and to achieve the park's goals, visitor experiences should focus on education and stewardship activities that help to improve the park's ecosystem health and effectively connect people with the natural world, such as volunteer restoration and monitoring programs, rather than on recreational activities already available in other places. This park should not try to be "all things to all people".
- The Rouge National Urban Park needs to provide an effective ecological connection between Lake Ontario and the Oak Ridges Moraine. This requires ensuring that the Federal Greenbelt lands are kept permanently free of urban development.
- New legislation must prioritize ecosystem health, include a science-based management framework, highlight the importance of compatible management of the greater park ecosystem, ensure connectivity from Lake Ontario to the Oak Ridges Moraine, and protect the aquatic component of the park ecosystem.

For more information:

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