Speech before the Standing Senate Committee on Energy, the Environment and Natural Resources

May 30, 2017

It is a pleasure to be here to talk to you today about Bill C-18. I am sure you have heard a lot about ecological integrity which includes the concept of natural processes such as fire, flood, erosion, natural regeneration of forests, etc. There was a reason that the most respected National Park Agency in the world did not put Ecological Integrity into the original act for the creation of the RNUP.

However, Section 2 of Bill C-18 says that the Rouge National Urban Park Act is amended by adding the definition of ‘ecological integrity’ by using the exact wording found on the Parks Canada web site which is also used for National Parks.

When Parks Canada implements this policy, will forest fires and floods be allowed? Can the natural process of erosion on trails and river banks be remediated? Can berms be constructed to divert field runoff away from rivers? And there are many other questions such as;

Can Ontario construct more roads, expand pipelines or add more hydro towers in the Rouge? Not under ecological integrity, however the only request Ontario made when first asked for input into the Act was to insure that 200 hectares were available for additional infrastructure. The RNUP Act Section 16. (1) states “Public lands ... in the Park may be disposed of to a federal or provincial authority, ... for the purposes of the installation or maintenance of public infrastructure, including public utilities or transportation corridors. 16. (2) lists up to 200 hectares. Ontario has betrayed its own stated desire for Ecological Integrity while insisting everyone else must adhere to this standard.

The last time I spoke before this committee, I said that ‘ecological integrity’ could not be in the act unless the definition was changed. Well, Parks Canada has done the next best thing. They have greatly added to the clarification of that term in reference to their Parks. The stress is on management and working toward ‘ecological integrity’, not leaving processes to work on their own.

Furthermore, Parks Canada, working with federal, provincial, and territorial agencies and with the United States National Park Service produced a booklet called Principles and Guidelines for Ecological Restoration in Canada's Protected Natural Areas. (Updated: April 1, 2017 http://www.pc.gc.ca/en/nature/eco/re-er/pag-pel )

With the agreement of all these agencies, this booklet details what should be done in many situations to work toward ‘ecological integrity’. Some of the recommendations are:

- Using management methods ... (to) duplicate the role of natural processes as closely as possible. (3.2.1.3) (such as reforestation) [projects completed – Proj. #15]
- Restoring stable soil surfaces, stream banks and shorelines (3.2.2.1) [Proj. #6, 12]
- Installing permanent artificial structures to control flooding and erosion. (3.2.3.1)
✓ Restoring stream connectivity through the use of appropriate materials (3.2.3.2) [Proj. #4, 5, 14]

✓ revegetation of riparian areas; (3.2.3.2) [Proj. #7, 12]

✓ Seeding or planting in locations that have not been stabilized (3.2.2.1) [Proj. #9]
✓ stabilization of a rapidly eroding sites (4.5.1) [desperately need in Ont. lands]
✓ Restoring natural hydrologic flow to protect ecosystems. (3.2.3.2) [Proj. #1, 2, 3, 4, 5, 8, 10, 11, 12]

This document stresses action and working toward establishing natural processes but using other more active methods when necessary such as reforestation, pond creation, etc.

What about the farmers who are not mentioned in this booklet? Should they be concerned for the future with Ecological Integrity as a rule for the park.

One opponent talking about Rouge farmers said, “The interests of a few people are being put above the interest of the public and the interest of the environment.” (Toronto Star, Rouge National Park: a place for nature — and farmers? Marco Chown Oved Staff Reporter, Published on Sun Nov 25 2012) Do these opponents see ‘ecological integrity’ as a means to an end – the elimination of farming in the Rouge? I would say YES.

Let’s examine ways how strict adherence to Ecological Integrity can put pressure on farming inside the park.

1. Can farmers cut back the naturally generated hedgerows around the fields? OR install farm field drainage tiles? They need to do these.

2. Can farm animals, such as cattle, coexist with the natural processes of Ecological Integrity? No. Riding Mountain National Park in Manitoba is in MP Robert Sopuck’s riding. He recently told the Commons that “In the name of ecological integrity, grazing was eliminated in the park. . . . . they (farmers) were all summarily told to leave, at great cost to individual farmers, and with no compensation whatsoever.” He added “Adapting ecological integrity in the Rouge could see many Rouge farmers evicted from working farms that have been in production since as early as 1799.”

Ecological Integrity causes much confusion so that it needs an entire booklet to clarify it, so why is this amendment needed?

In Jan. of 2013, the Province of Ontario signed an agreement to transfer Ontario lands in the Rouge to Parks Canada. Yes – more than four years ago. The reason for the delay was the claim that Federal protections for the park did not meet or exceed provincial protections. This was soon disproved and Alan Latourelle, the former CEO of Parks Canada, said: “Any individual or organization that directly or indirectly implies that the federal legislation for Rouge National Urban Park does not meet the standard of the current provincial legislation for Rouge lands is misleading the public.” The Premier of Ontario then used the term ‘ecological integrity’ as her reason for more delays.
Despite pointing out these problems, I ask you to pass this legislation as quickly as possible. My reasons are that the plants, animals and ecosystems of the Rouge Park have been ignored for far too long. Hunting, poaching, erosion and many other problems exist on Ontario lands with no remediation. Ontario has not addressed these issues and refuses to hand over the lands to an organization which has the knowledge, ability and the will to make positive changes in the Rouge. Additional delays will only compound the problems. So passing these amendments will remove Ontario’s last objection and maybe Ontario will then hand over the lands.

As far as ‘ecological integrity’ is concerned, environmentally responsible people, including Parks Canada under the guidance of the booklet Principles and Guidelines for Ecological Restoration will continue to do what is the best for the Rouge National Urban Park – its plants, animals and environment. They will also keep farms and the cultural heritage a significance part of the park.

Thank you.
LAND TRANSFER

Less than two years ago, the Federal government promised to hand over and additional 21 km² to the RNUP and on May 15 of this year, the Federal Government fulfilled that promise. The previous Conservative Federal Government transferred 20 km² to the RNUP and now the present Liberal Federal Government has transferred 21 km² to the RNUP but the Ontario Government is the only one which has not transferred its portion of land for the park 4 ½ years after making the promise to do so. I don’t know why the Provincial government is taking so long.

PARKS CANADA DEFINITION OF ‘ECOLOGICAL INTEGRITY’

Apr 4, 2017 - According to the Canada National Parks Act, the law governing national parks in Canada, "ecological integrity" means, with respect to a park,

ecological integrity means, with respect to the Park, a condition that is determined to be characteristic of its natural region and likely to persist, including abiotic components and the composition and abundance of native species and biological communities, rates of change and supporting processes.

SOME PROBLEMS ON ONTARIO LANDS

- Large hole on pedestrian bridge over the Rouge River at the Mast trail
- Extensive erosion on Riverside Trail. Approximately 2 metres eroded this spring alone at one point resulting in clouding the water with mud and soil creating a poor river environment for spawning fish and for attracting salmon back to the river. While Federal Government spends money up stream of the Ontario Lands to rehabilitate rivers, the neglect on Ontario Lands is having great negative ecological consequences downstream. More than a century after our once thriving population of Atlantic Salmon were last seen in Lake Ontario, the Ontario Federation of Anglers and Hunters (OFAH) and the Ontario Ministry of Natural Resources and Forestry (MNRF), together with many other partners, are working to bring Atlantic Salmon back to the lake and rivers. The Rouge is not one of these rivers because it is still unsuitable to sustain a viable population of salmon.
- Large trees are falling into the Rouge Rivers impeding fish and water flow. These are usually washed away to the mouth of the Rouge where they present water hazards for paddlers.
- Other erosion on Riverside Tr. Has caused hikers to walk along trail which is right beside the 4 ft drop to the river.
• First and second hills going south on Mast trail have severely eroded over the years of neglect creating a depression more than 1.7 metres deep and creating a dangerous place to walk

• Acres of invasive non native black swallowwort (DSV) has eliminated much of the native plants near the observation deck on the Vista trail.

• Recently opened to the public, one of Bob Hunter Park’s trails is eroding and in need of remediation. (Mark Schmidt – Parks Canada National Trails Coordinator.)

If neglect is Ecological Integrity, then the Ontario Government is following this this concept.

LIST OF SOME OF THE REHABILITATION PROJECTS

Project 1 Fish Habitat Enhancement

Parks Canada will improve fish habitat in a headwater stream by restoring wetlands to normalize stream flows and filter agricultural runoff, and planting native shrubs and trees to cool stream water.

Project 2 Water Quality Enhancement

Parks Canada will enhance water quality and aquatic ecosystem health by creating a grassed waterway to prevent further erosion into a watercourse. The existing swale will be regraded and planted with perennial grasses in order to mitigate soil erosion and filter agricultural runoff.

Project 3 Swamp Restoration

Just downstream of Project 1, water from an existing swamp is currently draining into an agricultural drain. By installing a small berm and new water control structure, the swamp will retain water for a longer period of time, benefitting the wetland flora and fauna that depend upon it. As well, this work will improve farm drainage and mitigate erosion, resulting in water quality improvements downstream.

Project 4 Aquatic Connectivity Enhancement

A set of three undersized culverts in the headwaters of the Little Rouge River that currently block the movement of fish and other aquatic species will be replaced with one much larger culvert to allow for free flow of the stream and improved connectivity for aquatic species.

Project 5 Reducing Soil Erosion

A failing, undersized farm crossing culvert in the headwaters of the Little Rouge River will be replaced with a much longer and wider culvert to allow for the safe movement of modern farm equipment while reducing damage and erosion of the stream bank. This project will improve water quality and the connectivity of aquatic habitat, while improving function of the farm.
**Project 6 Connecting and Improving Fish Habitat**

An undersized farm crossing culvert in the headwaters of the Little Rouge River will be replaced with a much longer and wider culvert to allow for the safe movement of modern farm equipment while reducing damage and erosion of the stream bank. This project will improve water quality and the connectivity of aquatic habitat, while improving function of the farm.

**Project 7 Native Shrub Planting**

The banks of a relocated stream, which historically supported specialist cold water fish species, will be planted with native shrubs to improve natural cover and stream shading and create a vegetated buffer to protect the stream from run-off from the adjacent road. The plantings will help keep the water cool, improve water quality, increase habitat availability for wildlife and improve aesthetics. Ultimately, this project may help to bring important cool and cold water fish species back to the stream.

**Project 8 Wetland Habitat Improvement**

A headwater wetland that was formerly cleared and used for pasturing cattle will be restored through the planting of native trees and shrubs. The restoration of natural cover in this area will help improve water balance in the area and keep water cool as it flows downstream.

**Project 9 Restoration of a Natural Stream Channel**

As part of a multi-year project, Parks Canada will initiate survey work on a headwater stream of the Little Rouge that has been straightened and channeled to improve agricultural drainage. The intent of this project is to investigate the potential to restore a natural stream channel while at the same time mitigating agricultural drainage problems that currently exist along the reach of the stream.

**Projects 10 and 11 Headwater Wetland Restoration**

Parks Canada will restore two important headwater wetlands on the only cold water creek that currently exists in the park. By capturing tile drain runoff from adjacent fields, headwater wetlands will be restored in areas where they would have existed historically. Restoration work will improve creek base flow, filter out sediments and nutrients before they enter the creek, and improve fish habitat. Areas surrounding the new wetlands and creek will be planted with native trees and shrubs to provide shade for fish and help control erosion.

**Project 12 Stream Buffer Planting**

Planting of buffer strips will occur along Katabokokonk Creek, a cool water stream, in order to filter sediments and nutrients and improve water quality. In future years, native shrubs will be planted along these buffer strips to help cool the stream. This work will help to restore conditions suitable for the specialist cold water fish species that historically existed in this creek.
Project 13 Invasive Species Control

Invasive trees will be removed from an old hedgerow and former residential lot, and useable agricultural areas will then be restored in collaboration with the local farmer. This work will enable the restoration of the marginal agricultural field described in Project 15 below.

Project 14 Wetland Habitat Restoration

A wet, marginal agricultural area will be restored by planting native trees and shrubs. The restoration of natural cover in this area will help improve water balance in the area and keep water cool as it flows downstream.

Project 15 Forest Restoration

A marginal agricultural field will be restored to an upland forest by planting native trees and shrubs. This restoration work will help to increase natural cover and connectivity in the area, thereby contributing to watershed and ecosystem

ECOLOGICAL CORRIDOR

I want to acknowledge and thank the authors of this amendment for not including the 600 metre ecological corridor, which would have eradicated hiking from much of the Ontario lands and eliminated many of the farms in Markham and north Pickering or made their farms unviable by drastically reducing their size.

DELAY

Ontario Minister Duguid announced in June of 2016, that the Ontario lands would be transferred as soon as April 1 2017. That day has passed and there is still no announcement about the transfer of the lands.

ABORIGINAL PEOPLES

Some time after the aboriginal peoples moved into Ontario they supplemented their hunting and gathering with what they called the three sisters, squash, corn and beans. They became farmers and altered their environment by cutting down trees and planting their crops. They presumable cleared unwanted plants, all of which were native. They altered their environment and did not follow ecological integrity. Their small numbers had little effect on the ecology as when the game was scarce and the ground nutrients exhausted they moved on leaving their land to the ecosystem processes of natural regeneration. We cannot leave nature by itself to do this now.
OTHER EXAMPLES OF POSSIBLE PROBLEMS WITH ECOLOGICAL INTERGRITY

1. The natural progression of invasive species is happening in the RNUP. Can unwanted and invasive plants by controlled? No, that would interrupt a natural process but in some areas native plants and animals must be protected from invasive species as much as possible.

2. Are floods going to be controlled? No, flooding is also part of natural processes. Again, flood control will be done to protect private property such as the Toronto Zoo buildings and infrastructure, etc.

3. The natural succession of filling in of headwater and other ponds must take place under ‘ecological integrity’. This results in fewer temporary water storage which in turn results in less water filtrating into the water table, warmer water in the rivers, more pollutants not being filtered out naturally, etc. Can headwater ponds be constructed? Not under the natural process portion of ‘ecological integrity’. However, the rehabilitation of headwater ponds is good for ecological health of the Rouge Rivers.

4. Reforestation: Two rehabilitation reforest projects have already been completed which has improved ecological health of large areas. These would not have been allowed under ecological integrity.

5. Can streams be altered to be more like their original condition? No. However, this would improve the ecological health of that stream and one rehabilitation project like this has already been competed.

6. Can new trails be created, visitor centres constructed, etc.? No, none of these are natural. A People’s Park must have public amenities and these do exist in National Parks.

7. Can trees be planted along streams to cool the water and make that environment more suitable to sustain salmon and other fish which use to live in the Rouge Rivers? This is not following ecosystem processes, so NO. But this was already done on one river and is critical to the ecological health of the Rouge Valley water systems.

8. A beaver is building dam near the backyards of houses around the RNUP. Do we allow these houses to be flooded out?

FARMS

1. A farm road crossing a stream is eroding, creating a dangerous condition for farmers. Can it be repaired? No, not if the natural process must be followed. For farmers to survive, conditions like this must be addressed and have in two projects already completed in the RNUP.
CULTURAL HERITAGE

☐ Seeking advice of cultural heritage resource specialists to assess the impact of changes in management strategies upon cultural heritage (3.2.1.1)

PARKS CANADA OTHER POINTS IN BOOKLET

☐ Placing priority on removal of invasive plant and animal species. (3.2.1.2)

☐ Restoring stable soil surfaces, stream banks and shorelines through the re-initiation of natural processes, and/or using natural materials. (3.2.1.2)

☐ Restoring stream connectivity through the use of appropriate materials (e.g. corrugated metal versus plastic culverts) and procedures (e.g. revegetation of riparian areas; removal or modification of stream crossings) (3.2.3.2)

☐ a short-term option, such as stabilization of a rapidly eroding site, may be chosen while longer-term plans are developed. (4.5.1)

☐ Restoring natural hydrologic flow to protect ecosystems. (3.2.3.2)

TORONTO’S COMPARISON OF PROTECTIONS

Feb. 10, 2015