

### Alisa Mahrova

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**From:** Jim Robb <jimrobb@frw.ca>  
**Sent:** Thursday, June 17, 2021 4:54 PM  
**To:** John MacKenzie; Anil Wijesooriya; Laurie Nelson; Richard.ubbins@trca.ca; Jennifer Innis; Regional Councillor Jack Heath; Alisa Mahrova; Alisa Mahrova; ghighet@uxbridge.ca; councillor\_perruzza@toronto.ca; Dipika Damerla; Councillor Fletcher; Jackson, Linda; Joanne.dies@ajax.ca; Alisa Mahrova; Alisa Mahrova; Michael Tolensky; Councillor McKelvie  
**Cc:** [REDACTED]  
**Subject:** Rouge National Park Boardwalk Proposal - Federal Breach of Ontario Canada RNUP Agreement and Serious Flooding, Ecological, Parking, Traffic, and Public Safety Liabilities  
**Attachments:** 1 FRW Rouge Boardwalk Letter to Parks Canada June 17 2021 Final.pdf

**Dear TRCA Board and Senior Staff:**

Attached and below please find reasons for linking the Waterfront and Mast Trails **without building a Boardwalk through the Rouge Wetland and Floodplain** – an area with **“extreme flooding and erosion” liabilities and critical habitat for species at risk**. Parks Canada and the TRCA will create dangerous problems and precedents if the non-essential Rouge Boardwalk is built in the Provincially Significant Rouge River Wetland and Floodplain – a designated Environmentally Sensitive Area (ESA) and **“hazardous land”** area.

Ontario transferred its Rouge Park Lands (like the Rouge Wetland) to Parks Canada with a condition (2.09) which stipulated that Parks Canada would “meet or exceed” Ontario Conservation Laws and Policies. **Although the TRCA has a partnership with Parks Canada, and the TRCA wants federal funding for its good work, it would be a serious breach of your legal framework and public mandate, if the TRCA helps Parks Canada circumvent “common sense” floodplain and the hazardous land policies.**

**We look forward to our reply to the issues raised in this Email and the attached letter to Parks Canada.**

#### **Hazardous Lands - Floodplain and Wetland Laws and Policies**

Ontario’s *Conservation Authorities Act* and Regulation 166 strictly limit development in floodplains, wetlands, valleys and shorelines. These areas are legally defined as **“Hazardous Lands”** due to **“flooding, erosion, dynamic beaches and unstable soil”**. With respect to developments like the Rouge Wetland Boardwalk, Toronto and Region Conservation Authority (TRCA) Policy 8.10.2 clearly states:

***“new major recreational uses will not be permitted within hazardous lands, watercourses, wetlands or natural features”.***

This policy and other similar TRCA policies are designed to:

- ***prevent loss of life and minimize property damage and social disruption.***
- ***prevent ... alterations that affect the control of flooding, pollution, erosion.***
- ***avoid public and private expenditure for emergency operations, evacuation & restoration.***

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Parks Canada and its collaborators will be circumventing these policies, and setting a bad example and a terrible precedent, if the Rouge Wetland and Floodplain Boardwalk is built.

### Extreme Flooding and Erosion Risks

After record-breaking flooding damage in 2019, the Minister of Environment and Climate Change publicly stated: *“one-in-100-year floods are now happening every five years”*. Whether you agree with this Minister McKenna statement or not, the evidence clearly indicates that Climate Change, urban growth and deforestation are increasing flooding frequencies, liabilities and costs.

Parks Canada’s own website acknowledges the ***“Extreme Flooding and Erosion Events”*** in the Rouge Wetland and Floodplain. **Consequently, there will be serious agency, professional, political and economic risks**, if the several-million-dollar two-kilometre-long Rouge Boardwalk Trail is built within the Rouge River Floodplain and Provincially Significant Wetland. This location is:

1. Legally designated as a *“hazardous land”* area, known to have 3 to 5-metre-high floods.
2. A hazardous land area where major new recreational developments are not permitted.
3. A designated Environmentally Sensitive Area with critical habitat for species at risk.
4. An area surrounded by narrow residential roads with serious parking and traffic constraints.

A Scarborough Mirror Article (June 7, 2016) provided this historical account of flooding in the Rouge Wetland and Floodplain in October 1954 due to Hurricane Hazel:

***“The water rose to a depth of five to seven metres ...”***  
***“The West Point Crescent bridge was washed away”***  
***“debris smashed against the narrowing banks near the [railway] bridge creating a dam”.***

Flood risks have increased since Hurricane Hazel due to climate change and the increased runoff from 100+ km<sup>2</sup> of additional urban development in the Rouge Watershed. The proposed Rouge Wetland Boardwalk and its southern Bridge and Plaza would create new floodplain obstructions in the immediate vicinity of the narrow Rouge River outlet to Lake Ontario at the VIA and GO Train railway bridge and embankment. These new obstructions would increase the risk of debris dams, elevated flood heights, and damaging torrential flows and erosion.

**In terms of flooding, Parks Canada's own 2020 Project Feasibility Study by AECOM states:**

***“to build above the 100-year floodplain elevation, a raised boardwalk with a height of approximately 3.05 metres would be required in some locations. ... It was determined upon consultation with Parks Canada that a raised boardwalk above the 100-year floodplain elevation did not embody the visitor experience or aesthetic that is sought for the trail, and that the technical implications of building such a high boardwalk were not feasible ...***

### Dangerous Mischaracterization of Flooding Levels by Parks Canada Recently

The 2020 Project Feasibility Study concluded that it would **not be technically feasible or aesthetically desirable** to build the Boardwalk above the 3-metre-high 100-year flood level. The Superintendent of Rouge National Urban Park (RNUP) is ignoring these technical conclusions when he now says:

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*“100-year flood levels in the Rouge Wetland are closer to 3 feet (0.9 metre), not 3 metres.” (West Rouge Magazine, Spring)*

*“The boardwalk would be built in line with 100-year flood levels” (Parks Canada Letter to FRW, May 18, 2020)*

This 3-foot flood level statement is dangerously misleading because it only refers to the gradual back-water flooding in the Rouge Wetland when Lake Ontario water levels are high. This statement imprudently ignores the dangerous 3-metre-high Rouge River torrential flood flows which can occur during a 1-in-100-year rainfall event. As Minister McKenna and scientists have observed, the 1-in-100-year flood of the 20<sup>th</sup> Century is becoming the 1-in-5-year to 1-in-25-year flood of the 21<sup>st</sup> Century due to climate change.

### **Hazardous Lands - Floodplain and Wetland Laws and Policies**

With respect to developments like the Rouge Wetland Boardwalk, Toronto and Region Conservation Authority (TRCA) Policy 8.10.2 clearly states: ... *“new major recreational uses will not be permitted within hazardous lands, watercourses, wetlands or natural features”*. This policy and other similar TRCA policies are designed to:

- ***prevent loss of life and minimize property damage and social disruption.***
- ***prevent ... alterations that affect the control of flooding, pollution, erosion.***
- ***avoid public and private expenditure for emergency operations, evacuation & restoration.***

Parks Canada and its collaborators will be circumventing these policies, and setting a bad example and a terrible precedent, if the Rouge Wetland and Floodplain Boardwalk is built.

### **Fencing Solves the Informal Trail Issue at a Fraction of the Boardwalk’s Cost**

Parks Canada pitches the Boardwalk as a solution to the many informal “social” trails in the Rouge Wetland. However, the informal social trails could be virtually eliminated by simply building fences across a few informal access points like the end of Island Road. Most of these informal trails are less than half a metre wide and they are mainly used by nearby residents, deer and other animals.

The fencing solution will cost thousands-of-dollars instead of the several-million-dollar cost of the non-essential Rouge Wetland Boardwalk. The fencing solution will save Millions-of-dollars which could be used to provide safe water supplies for Indigenous communities; affordable housing for those in need; and a Rouge Park shuttle bus to reduce parking and traffic problems in RNUP.

### **Ecological Integrity**

Contrary to the *RNUP Act* and the *Species at Risk Act*, the Rouge Boardwalk Trail would cut a Provincially Significant Coastal Wetland in half for its entire 2 km length. Despite best efforts, the construction, operation and maintenance of this Boardwalk will fragment and disturb habitat for migratory birds and fish, and species at risk, such as Blanding’s and Map Turtles and Least Bittern. Parks Canada websites acknowledges that building new trails can harm ecological integrity by fragmenting and disturbing sensitive habitats, like wetlands *“making them less able to support native plants and animals”* and making them susceptible to *“invasion by non-native species”*.

### **Traffic and Parking**

Rouge Beach and Wetland visitor numbers are comparable to Point Pelee National Park. The Rouge Beach and Wetland have only 120 parking lot spaces and Parks Canada wants to relocate 70. Point Pelee National Park has some 1,000

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parking spots. On busy weekends, cars and pedestrians overflow onto narrow residential streets without sidewalks surrounding the Rouge Beach and Wetland. This increasingly dangerous public safety issue will be compounded, if Parks Canada builds a Boardwalk which will attract even more visitors to an area with serious over-capacity issues.

### Managerial Priorities and Public Safety

The Rouge Boardwalk is a nightmare in the making in terms of community relations, public safety, and public liability. When agencies expand their empires with risky nonessential infrastructure, like the Rouge Wetland and Floodplain Boardwalk, they increase their managerial burden, costs and risks; and they increase the financial burden on taxpayers. Parks Canada should be prioritizing the safety, maintenance and improvement of existing RNUP Trails. The Mast and Vista Trails have unsafe rutting, many informal side trails, and rampant trampling in sensitive areas. Existing trail maintenance and improvements should take priority over the construction of a new Boardwalk in a Floodplain and a Wetland.

### Alternative Ways to Connect the Waterfront Trail and Mast Trail

Fortunately, there are alternative ways to connect the Waterfront and Mast Trails with less cost, less risk, less parking and traffic problems, and less environmental intrusion, than building a Boardwalk through the Rouge Wetland and Floodplain. Alternatives which warrant further consideration include:

1. Shuttle buses from the Rouge Hill Go Station, with its 400 empty weekend parking spots, to the Rouge Beach / Wetland; the Glen Rouge Campground (Mast Trail); the planned RNUP Visitor Centre near the Toronto Zoo; and other RNUP trailheads.
2. Creation of a rail underpass east of the Rouge Hill Go Train Station to allow visitors to walk from the GO Train Station to the Waterfront Trail and along the Waterfront Trail to Rouge Beach.
3. Platforms, binoculars and on-line Wetland "critter" cameras which will allow visitors to view the wetland and its wildlife from a safe and respectful distance.
4. Guided canoe trips by Parks Canada on the Rouge River between the Waterfront Trail and the Glen Rouge Campground's Mast Trail.
5. Utilization of existing roads outside of the wetland and the old Wynette Road allowance to access an existing trail which follows a terrace on the east side of the Rouge River to near Hwy 401 where a bridge could be built to connect with the Glen Rouge Campground.

Sincerely,

Jim Robb, for Friends of the Rouge Watershed

Phone: 647-891-9550

Email: [jimrobb@frw.ca](mailto:jimrobb@frw.ca)

**Patrons of Friends of the Rouge Watershed:** **Derek Lee**, former MP Scarborough Rouge River; **Rathika Sitsabaiesan**, former MP Scarborough Rouge River; **Lois James**, "Save the Rouge" founding member and Order of Canada Recipient; **Hon. David Peterson**, former Ontario Premier; **Hon. Raymond Cho**, MPP Scarborough North; **Hon. Gerry Phillips**, former MPP Scarborough Agincourt; **Hon. Alvin Curling**, former MPP Scarborough

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Rouge River; **Joyce Trimmer**, former Mayor of Scarborough, posthumous; **Paul Harpley**, "Save the Rouge" founding member; **Bobbi Hunter**, founding member of Greenpeace Executive.

**Friends of the Rouge Watershed (FRW):** Over the last three decades, Friends of the Rouge Watershed (FRW) have been leaders in the community-based campaigns which led to the creation of a 42 square kilometre Ontario Rouge Park, its subsequent evolution into a 79 square kilometre National Rouge Park, and the amendment of its legislation to prioritize ecological integrity. In 2016, FRW received the J.R. Dymond Award from Ontario Nature for our: *"tireless and inspirational role in the creation of Rouge National Park"* and *"exceptional work on the ground with stewardship and restoration projects."*



June 17, 2021

**Re: Proposed Rouge Wetland and Floodplain Boardwalk Trail - Serious Risks and Liabilities**

To: Omar McDadi, Field Unit Superintendent, Rouge National Urban Park  
Jeffery Sinibaldi, Senior Advisor, Corporate and Community Engagement

**Dear Parks Canada:**

After record-breaking flooding damage in 2019, the Minister of Environment and Climate Change publicly stated: *"one-in-100-year floods are now happening every five years"*. Whether you agree with this statement by Minister McKenna or not, the evidence clearly indicates that Climate Change, urban growth and deforestation are increasing flooding frequencies, liabilities and costs.

Parks Canada's own website acknowledges the **"Extreme Flooding and Erosion Events"** in the Rouge Wetland and Floodplain. Consequently, there will be serious agency, professional, political and economic risks, if the several-million-dollar two-kilometre-long Rouge Boardwalk Trail is built within the Rouge River Floodplain and Provincially Significant Wetland. This location is:

1. Legally designated as a *"hazardous land"* area, known to have 3 to 5-metre-high floods.
2. A hazardous land area where major new recreational developments are not permitted.
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***"debris smashed against the narrowing banks near the [railway] bridge creating a dam".***

Flood risks have increased since Hurricane Hazel due to climate change and the increased runoff from 100+ km<sup>2</sup> of additional urban development in the Rouge Watershed. The proposed Rouge Wetland Boardwalk and its southern Bridge and Plaza would create new floodplain obstructions in the immediate vicinity of the narrow Rouge River outlet to Lake Ontario at the VIA and GO Train railway bridge and embankment. These new obstructions would increase the risk of debris dams, elevated flood heights, and damaging torrential flows and erosion.

**In terms of flooding, Parks Canada's own 2020 Project Feasibility Study by AECOM states:**

***"to build above the 100-year floodplain elevation, a raised boardwalk with a height of approximately 3.05 metres would be required in some locations. ... It was determined upon consultation with Parks Canada that a raised boardwalk above the 100-year floodplain elevation did not embody the visitor experience or aesthetic that is sought for the trail, and that the technical implications of building such a high boardwalk were not feasible ... As such, a boardwalk with a height of 0.5m minimum was determined to be the desired outcome, which will allow the boardwalk to stay above typical storms below the 25-year level but may require seasonal closures.***

**FRW Patrons**

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

Hon. Raymond Cho  
MPP Scarborough North

Hon. David Peterson,  
former Ontario Premier

Hon. Gerry Phillips,  
former MPP  
Scarborough Agincourt

Hon. Alvin Curling,  
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Scarborough Rouge River

Derek Lee, former MP  
Scarborough Rouge River

Rathika Sitsabaiesan,  
former MP Scarborough  
Rouge River

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Mayor of Scarborough,  
posthumous

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## Hazardous Lands - Floodplain and Wetland Laws and Policies

Ontario's *Conservation Authorities Act* and Regulation 166 strictly limit development in floodplains, wetlands, valleys and shorelines. These areas are legally defined as "*Hazardous Lands*" due to "*flooding, erosion, dynamic beaches and unstable soil*". During the creation of Rouge National Urban Park (RNUP), Canada agreed to "meet or exceed" Ontario Conservation Plans and Policies.

With respect to developments like the Rouge Wetland Boardwalk, Toronto and Region Conservation Authority (TRCA) Policy 8.10.2 clearly states: ... ***"new major recreational uses will not be permitted within hazardous lands, watercourses, wetlands or natural features"***. This policy and other similar TRCA policies are designed to:

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## Dangerous Mischaracterization of Flooding Levels by Parks Canada Recently

The 2020 Project Feasibility Study concluded that it would not be technically feasible or aesthetically desirable to build the Boardwalk above the 3-metre-high 100-year flood level. The Superintendent of Rouge National Urban Park (RNUP) is ignoring these technical conclusions when he now says:

*"100-year flood levels in the Rouge Wetland are closer to 3 feet (0.9 metre), not 3 metres. "*

*"The boardwalk would be built in line with 100-year flood levels"*

This 3-foot flood level statement is dangerously misleading because it only refers to the gradual back-water flooding in the Rouge Wetland when Lake Ontario water levels are high. This statement imprudently ignores the dangerous 3-metre-high Rouge River torrential flood flows which occur during a 1-in-100-year rainfall event. As Minister McKenna and scientists have observed, the 1-in-100-year flood of the 20<sup>th</sup> Century is becoming the 1-in-5-year to 1-in-25-year flood of the 21<sup>st</sup> Century due to climate change.

After record-breaking flooding in 2019, the Ontario Government (OMNRF) commissioned an independent review which called for increased safety margins to address the limitations of flood modelling and management and the impacts of Climate Change. Parks Canada, AECOM and TRCA will be ignoring this call for greater safety margins if they:

- fail to prudently include the cumulative effects of rainfall and snowmelt, debris and ice dams, and high Lake Ontario water levels, within flood level predictions.
- fail to provide an accurate north-south cross-section of the Boardwalk Trail with the height of the flood deck and prudent predictions for flood levels for 1-in-25-year, 1-in-100-year, and regional storms.

- fail to acknowledge that the 1-in-100-year storm of the 20<sup>th</sup> century will likely occur at much shorter intervals in the 21<sup>st</sup> Century due to Climate Change.

The reality of these points was evident on January 13<sup>th</sup>, 2020, when the Rouge River overflowed its 2.2-metre-high riverbanks south of the Glen Rouge Campground after 7.7 cm of rain over 48 hours and concurrent snowmelt. This rainfall approximates a 1-in-20-year, two-day event. The Rouge River's banks are lower than 2 metres along the southern half of the proposed Rouge Wetland and Floodplain Boardwalk. Therefore, this 2.2+ metre-high river flood, and the ice and trees it entrained, would have flooded and damaged the southern part of the proposed Boardwalk. This recent real-world 1-in-20-year flood demonstrates the shocking inaccuracy of Parks Canada's statement that the 1-in-100-year flood in the Rouge Wetland is about 1-metre-high (3 feet).

### **High Lake Ontario Water Levels Increase Flooding Risks in the Rouge River Floodplain and Wetland**

Over the last century, annual precipitation has increased by nearly 10% in the Great Lakes region and more large precipitation events are occurring. In June of both 2017 and 2019, Lake Ontario water levels reached 1-in-100-year levels of 80+ cm above-average. Since it is located beside Lake Ontario, water levels also rose more than 80 cm in the Rouge Wetland and lower Rouge River. High Lake Ontario water levels create a backwater effect which further increases water levels in the lower Rouge River when a concurrent river flood occurs. This increases the likelihood of over-bank flows and damage to the proposed Rouge Wetland and Floodplain Boardwalk.

### **Rouge Beach and Wetland – Serious Parking, Traffic, Public Safety and Carrying Capacity Issues**

The proposed Rouge Wetland and Floodplain Boardwalk shows a disappointing lack of foresight with respect to the carrying capacity issues which will be crucial to the effective management of RNUP. Parks Canada has over-promoted the Rouge Beach and Wetland as a visitor destination, despite known parking, traffic, public safety and neighborhood problems and constraints, at this location.

Rouge Beach and Wetland visitor numbers are comparable to Point Pelee National Park. The Rouge Beach and Wetland have only 120 parking lot spaces and Parks Canada wants to relocate 70. Point Pelee National Park has some 1,000 parking spots. On busy weekends, cars and pedestrians overflow onto narrow residential streets without sidewalks surrounding the Rouge Beach and Wetland. This increasingly dangerous public safety issue will be compounded, if Parks Canada builds a Boardwalk which will attract even more visitors to an area with serious over-capacity issues.

### **Managerial Priorities and Public Safety**

The Rouge Boardwalk is a nightmare in the making in terms of community relations, public safety, and public liability. When agencies expand their empires with risky nonessential infrastructure, like the Rouge Wetland and Floodplain Boardwalk, they increase their managerial burden, costs and risks; and they increase the financial burden on taxpayers. Parks Canada should be prioritizing the safety, maintenance and improvement of existing RNUP Trails. The Mast and Vista Trails have unsafe rutting, many informal side trails, and rampant trampling in sensitive areas. Existing trail maintenance and improvements should take priority over the construction of a new Boardwalk in a Floodplain and a Wetland.



## Fencing Solves the Informal Trail Issue at a Fraction of the Boardwalk's Cost

Parks Canada pitches the Boardwalk as a solution to the many informal “social” trails in the Rouge Wetland. However, the informal social trails could be virtually eliminated by simply building fences across a few informal access points like the end of Island Road. Most of these informal trails are less than half a metre wide and they are mainly used by nearby residents, deer and other animals.

The fencing solution will cost thousands-of-dollars instead of the several-million-dollar cost of the non-essential Rouge Wetland Boardwalk. The fencing solution will save Millions-of-dollars which could be used to provide safe water supplies for Indigenous communities; affordable housing for those in need; and a Rouge Park shuttle bus to reduce parking and traffic problems in RNUP.

## Threats to Ecological Integrity and Species at Risk

Contrary to the *RNUP Act* and the *Species at Risk Act*, the Rouge Boardwalk Trail would cut a Provincially Significant Coastal Wetland in half for its entire 2 km length. Despite best efforts, the construction, operation and maintenance of this Boardwalk will fragment and disturb habitat for migratory birds and fish, and species at risk, such as Blanding’s and Map Turtles and Least Bittern.

Parks Canada websites acknowledges that building new trails can harm ecological integrity by fragmenting and disturbing sensitive habitats, like wetlands “*making them less able to support native plants and animals*” and making them susceptible to “*invasion by non-native species*”.

Scientists have radio-tracked endangered Blanding’s Turtles throughout the Rouge Wetland where the Boardwalk is proposed. The Natural Values Report which was prepared for Parks Canada states:

*“The Rouge Marsh is known to support a small population of federally Endangered Blanding’s Turtles ... **The entire Rouge Marsh and adjacent area is considered as critical habitat for Blanding’s Turtle**”.*

The Boardwalk Trail would disturb this “critical habitat” over an area several metres wide and more than two-kilometres-long through the entire length of the Rouge Wetland. Hundreds of helical posts would be drilled into the bottomland mud and upland sands where three at-risk turtle species hibernate in the late fall and winter, and lay their eggs in late spring. Since there only a few breeding adults, the loss of just one adult or nest could cause a local population collapse.

Heavy transport vehicles and cranes will be needed to build the three Boardwalk Trail Bridges (42 metre, 42 metre and 26 metre spans) over the Rouge River and Marsh. Due to the large size and turning radius of this heavy equipment, tree and vegetation removal and ground trampling is inevitable. When a 100 metre Boardwalk lookout was built two decades ago, the crane tipped and discharged diesel fuel and oil into the Rouge Wetland.

Least Bittern feed and nest in the Rouge Wetland and they have been sighted again in 2021 during the breeding season. Sensitive species, like the Least bittern, could be frightened-away by the ongoing visual and noise impacts associated with thousands of people walking on a Boardwalk in the middle of a Provincially Significant Wetland.

## **Increasing Parks Canada's Climate Change and Ecological Footprint**

Building a Boardwalk in an area with “*extreme flooding and erosion events*” and several species at risk, will increase, rather than mitigate, our growing Climate Change and Biodiversity challenges. The Rouge Wetland and Floodplain Boardwalk will increase Parks Canada's carbon emissions due to the use of some 200,000 board feet of wood and thousands of metres of steel support posts and beams. This carbon footprint will continue due to routine deck replacement every 15 years and expensive repairs after large flooding events. In addition, the Boardwalk's pressure-treated wood will slowly rot and release toxic copper compounds which harm fish and wildlife.

## **Alternative Ways to Connect the Waterfront Trail and Mast Trail**

Fortunately, there are alternative ways to connect the Waterfront and Mast Trails with less cost, less risk, less parking and traffic problems, and less environmental intrusion, than building a Boardwalk through the Rouge Wetland and Floodplain. Alternatives which warrant further consideration include:

1. Shuttle buses from the Rouge Hill Go Station, with its 400 empty weekend parking spots, to the Rouge Beach / Wetland; the Glen Rouge Campground (Mast Trail); the planned RNUP Visitor Centre near the Toronto Zoo; and other RNUP Trailheads.
2. Creation of a rail underpass east of the Rouge Hill Go Train Station to allow visitors to walk from the GO Train Station to the Waterfront Trail and along the Waterfront Trail to Rouge Beach.
3. Platforms, binoculars and on-line Wetland “critter” cameras which will allow visitors to view the wetland and its wildlife from a safe and respectful distance.
4. Guided canoe trips by Parks Canada on the Rouge River between the Waterfront Trail and the Glen Rouge Campground's Mast Trail.
5. Utilization of existing roads outside of the wetland and the old Wynette Road allowance to access an existing trail which follows a terrace on the east side of the Rouge River to near Hwy 401 where a bridge could be built to connect with the Glen Rouge Campground.

## **Conclusion**

Park's Canada should implement the alternative ways to link the Waterfront and Mast Trails without building a Boardwalk through the Rouge Wetland and Floodplain – an area with “extreme flooding and erosion” risks and critical habitat for species at risk. Parks Canada will damage its reputation and create a dangerous precedent, if it builds the non-essential Rouge Boardwalk in the Provincially Significant Rouge River Wetland and Floodplain – a designated Environmentally Sensitive Area (ESA).

Over the last three decades, Friends of the Rouge Watershed has helped to create the vision of a Rouge National Park which is accessible to millions of Canadians by transit. Public access should be safe, low-impact and compatible with environmental, social and managerial carrying capacities. The proposed Rouge Wetland and Floodplain Boardwalk Trail fails on all these points.

The Federal Government and Parks Canada should be prioritizing the reforestation of the 25-km-long Rouge Park and Greenbelt “main ecological corridor” between Lake Ontario and the Oak Ridges Moraine. Restoring this main ecological corridor will address the United Nations “Decade of Ecosystem Restoration” challenge; it will combat climate change, pollution and flooding; it will prioritize ecological integrity; and it will spread increasing visitor use over a much larger area. The delayed reforestation of this “main ecological corridor” is contributing to the serious over-capacity issues in the environmentally sensitive areas of the lower Rouge Valley (e.g., Mast and Vista Trails).

FRW supported the creation of a National Rouge Park, and we believe that Parks Canada offers the best chance to protect and restore ecological integrity in the long term. After working to the achieve this goal for more than 34 years, we appreciate the challenges and complexities of creating and managing a national park next to Canada's biggest City. Thank you for tackling this challenge.

We look forward to your response to the attached questions. We are still awaiting the provision of the additional information that you had agreed to provide on May 12, 2021.

We understand that your Environmental Impact Assessment is nearing completion and we request a meeting with you in the next few weeks to further discuss these issues. We also request access to the Impact Assessment when it is released.

Sincerely,



Jim Robb, for Friends of the Rouge Watershed

Phone: 647-891-9550

Email: [jimrobb@frw.ca](mailto:jimrobb@frw.ca)

Giving Nature a voice and a helping hand.  
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**FRW Questions:**

A) AECOM's Feasibility Study puts the 100-year-flood at 3.05 metres above the reference level. Are you now planning to build the Boardwalk above the 3.05 metre level of the 100-year-flood? Or are you still planning to build the southern sections of the Boardwalk at well-below the 100-year flood level? What are the implications for the project design, cost and ecological impacts?

B) Please correct me if I am wrong, but it is my understanding that the 3.05 metre flood level is measured from a reference water level. Are you using the "precautionary principle" and the 2019 high water levels in the Rouge Wetland as the reference water level? If not, why not?

C) To make a "due diligence" impact assessment decision, it is essential that you publicly provide, without further delay, a N-S Boardwalk Trail Cross-section showing the elevation of the Boardwalk Deck (ASL) for its entire length in relation to:

- Prudent predictions of the 25-year, 100-year and regional flood water levels (ASL)
- Ground elevation contours (ASL)
- 2017 and 2019 Spring Water levels (ASL)

D) You were going to provide FRW with some documents at our May 12, 2021, meeting but we have not received them. Here are some quotes from your Email.

*"We can provide water levels from TRCA "Hydrological Engineering Center – River Analysis System" modeling in a table that AECOM created at Wednesday's meeting".*

*" We have the social trail map, and we will bring it with us to Wednesday's meeting".*

*"We have a map of the project area, which captures the entire route wetland, that we will bring to Wednesday's meeting".*

E) AECOM on Fig # 4 page 8 provides locations of HEC-RAS Flood Elevation Cross-sections but on pg 9 only provides Cross-Sections 11, 14 and 16. Please provide the other cross-sections 1 to 17.

F) Can you please provide us with historical air photos, floodplain mapping, orthophotos and digital elevation models (high resolution) which have been referenced in your technical reports (AECOM).

G) Can we please obtain a copy of the Park Legal Boundary Survey (digital) for the area between Lake Ontario and Kingston Rd.

I) Do you know which agency built the existing pedestrian bridge, the parking lots and the marsh board walk at the mouth of the river, and can you provide the geotechnical and design reports?