



December 1, 2023

Kendra Couling  
Ontario Parks - Southeast Parks Zone  
300 Water Street, 4th Floor North  
Peterborough, ON K9J 3C7

Dear Kendra,

**Re: [ERO #019-7733](#) – Amendment to Ontario Regulation 316/07 under the Provincial Parks and Conservation Reserves Act, 2006 to create a recreational class provincial park in the Township of Uxbridge**

Thank you for the opportunity to provide input into the proposed regulation of a new recreational class provincial park. Ontario Nature recognizes the importance of providing access to experiences in nature for all. We appreciated the use of an online survey for gathering input from the public before proceeding with this regulation, as well as the clear information provided in the ERO posting. We hope that the naming of the new park will respect the Indigenous communities who have called this land home since time immemorial.

We support the regulation of this site under the Provincial Parks and Conservation Reserves Act. As an organization dedicated to protecting wild species and wild spaces we want to ensure that future development of this new park is done carefully, respecting ecological integrity and minimizing impacts to sensitive features. We are pleased that the public survey results acknowledge the importance of maintaining ecological integrity.

We are concerned that future new development in a newly regulated park will take place without the important guidance and legislative oversight previously provided through the Environmental Assessment Act. The new project evaluation policy is insufficient, as documented in [our submitted comment on ERO #019-7356](#). Therefore, when management planning proceeds for the new park we urge Ontario Parks to apply the principles of ecologically-sensitive park management and development that have been refined for the past twenty years using the guidance once provided by the *Class Environmental Assessment for Provincial Parks and Conservation Reserves*.

Our specific concerns for future development in this landscape can be addressed by applying the following approaches:

- Using an evidence-based approach for determining the ecological carrying capacity for sustainable recreation within the park and basing the facility footprint on that carrying capacity.
- Ensuring that at least 75 per cent of the park's area is zoned as natural environment or nature reserve, which is in alignment with the IUCN protected area categories and the pan-Canadian approach to accounting for protected and conserved areas. A development footprint that exceeds this amount would call into question the inclusion of this new park in the Canadian Protected and Conserved Areas Database.
- Ensuring that facilities, infrastructure, and their access are sited to minimize fragmentation and disturbance of wetlands and other significant ecological features.

We commend the cooperative approach used to identify this site and celebrate this success for our member group Green Durham Association. Nonetheless, we call on the Ontario government to undertake a more comprehensive and strategic approach to updated protected areas system planning, including implementing the recommendations of MECP's Protected Areas Working Group. Now is the time to truly advance protected areas in the province and contribute to the goals of Ontario's Biodiversity Strategy, including the target to conserve 30 per cent of terrestrial and aquatic ecosystems by 2030.

Yours sincerely,



**Corina Brdar**  
*Conservation Planning and Policy Manager*  
Ontario Nature