

December 13, 2019

Senior Project Coordinator
Ontario Parks - Issues Management, Coordination and Planning Section
300 Water Street
6th Floor, South tower
Peterborough, ON
K9J 3C7

Dear Senior Project Coordinator,

Re: ERO # 019-0907 Proposed amendments to the Rondeau Provincial Park Management Plan

On behalf of the under-signed organizations, we would like to express our opposition to the extension of cottage leases in Rondeau Provincial Park for the purpose of consulting on “the long-term occupation of cottage lots in Rondeau Provincial Park.” For over 60 years the Government of Ontario has acknowledged the need to phase out private cottages in provincial protected areas, such as Rondeau Provincial Park. To now contemplate “long-term occupation” is unacceptable given Rondeau’s exceptional biodiversity values and the known harm caused by the cottages and associated activities.

Abandoning commitment to phase out Rondeau cottages

In 1954, when the Government of Ontario passed the Provincial Parks Act, it reversed its policy of supporting private cottaging in provincial parks. Accordingly, in 1960, it announced that existing cottage leases in Rondeau, once they expired, would not be extended beyond 21 years. There were several subsequent extensions of the expiry dates, however, including most recently to December 31, 2019. The purpose of the current proposal, which is to provide three years to consult on “the long-term occupation of cottage lots in Rondeau Provincial Park,” suggests that the government intends to step away from its long-standing commitment to phase out the cottages and is targeting long-term occupation instead. Yet the ERO posting provides no rationale or evidence to support this dramatic reversal in policy direction.

Nor has the Ministry of Environment, Conservation and Parks (MECP) provided any information on the long-term options it is considering. Sale of the cottages is one of the rumoured options, another being the granting of 99-year leases. Senior Program Coordinator of the Cottage Lot Program, Sandy Dobbyn, was “not at liberty” to confirm or deny these rumours or to discuss the options for long-term occupation being

considered by MECP, when contacted by Ontario Nature on December 3, 2019. Regardless, long-term occupation in any form is bad news for Rondeau and the people of Ontario for the reasons outlined below.

Jeopardizing Rondeau's exceptional biodiversity values

Rondeau is renowned for its exceptional biodiversity which includes rare dune, prairie and savannah ecosystems (12 of which are critically imperiled and seven of which are provincially significant), a provincially significant wetland, and the largest remaining tract of deciduous forest in Carolinian Canada. These ecosystems provide habitat for over 80 species at risk, the highest of any Ontario Provincial Park, including prothonotary warbler, Fowler's toad, five-lined skink, spotted gar and nodding pogonia (one of only two locations in Canada for this endangered wildflower). Over 300 nationally, provincially or locally significant plant species, and over 1,700 insect species – many of which are found in only a few places in Ontario – are also among its inhabitants.

Rondeau is located on a cusped sand spit, a provincially significant earth science feature found nowhere else in Canada. The park is also a globally and nationally significant Important Bird Area and a provincially significant life and earth science Area of Natural and Scientific Interest (ANSI). It is situated in Chatham-Kent, which has only about four percent natural cover remaining - less than any other upper tier municipality in Ontario. The need to put nature first in this small, unique and extremely biodiverse Provincial Park could not be more obvious.

Contravening dedication of Provincial Parks to the people of Ontario

Ontario's provincial parks are dedicated to the public:

Parks dedicated to the public

6. Ontario's provincial parks and conservation reserves are dedicated to the people of Ontario and visitors for their inspiration, education, health, recreational enjoyment and other benefits with the intention that these areas shall be managed to maintain their ecological integrity and to leave them unimpaired for future generations.
(Provincial Parks and Conservation Reserves Act, 2005, sec. 6)

Everyone should have equal access to the many benefits they provide, not just privileged cottagers. Yet the cottages occupy 67 percent of the park's Lake Erie shoreline. Long-term occupation means long-term denial of public access to and enjoyment of these areas.

More importantly, long-term occupation will mean continued negative impacts to the park's wildlife and ecosystems. According to a 2017 environmental assessment (Category B project under A Class Environmental Assessment for Provincial Parks and

Conservation Reserves) the private cottages are not only causing harm to species at risk and rare vegetation communities, but are also leading to elevated concentrations of phosphorous and nitrates in groundwater, the release of contaminants in soils and sediments, and erosion. These negative impacts are the result of cottage structures, vegetation removal and mowing, foot paths, road mortality, invasive species introduction, pets (dogs and cats) and more. Long-term occupation thus contravenes the legal duty to manage the park so as to leave it unimpaired for future generations.

Conclusion

The need to put nature first in this small and extremely biodiverse protected area could not be more obvious. The proposal for long-term occupation of the park runs contrary to the guiding management principle for Ontario's Provincial Parks, which is to maintain ecological integrity.

3. The following principles shall guide all aspects of the planning and management of Ontario's system of provincial parks and conservation reserves:

1. Maintenance of ecological integrity shall be the first priority and the restoration of ecological integrity shall be considered.

(Provincial Parks and Conservation Reserves Act, 2005, sec. 3)

We do not support the three-year extension of the cottage leases, especially for the purpose of consulting on long-term occupation. Government consultations on this issue have been going on for almost 10 years, and it is time the government honoured its long-standing commitment to bring the leases to an end and turned its attention to restoring and maintaining ecological integrity in Rondeau Provincial Park.

Yours truly,

Caroline Schultz
Executive Director
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Don Scallen

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Hamilton Naturalists' Club



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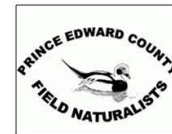
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