



July 24, 2019

Megan Pomeroy, Park Planner
Ontario Parks, Ministry of the Environment, Conservation and Parks
1350 High Falls Road, Bracebridge ON P1L 1W9

Dear Ms. Pomeroy,

**RE: Planning for Wasaga Beach Provincial Park (ERO #013-4471)
Wasaga Beach Provincial Park Master Planning Process
Town of Wasaga Beach Comments**

Thank you for the opportunity to provide comments and feedback on the Background Information Document and the Management Topics and Options Document, released by Ontario Parks, Ministry of the Environment, Conservation and Parks on June 21, 2019.

The Wasaga Beach Provincial Park is a unique park that is nestled within the broader urban area of the Wasaga Beach community. As such, planning for the park and the community is integrally related. The Town looks forward to working closely with Ontario Parks staff in creating a Wasaga Beach Provincial Park Master Plan that provides for a balance between the natural environment, cultural heritage, and the recreational opportunities available for visitors to Wasaga Beach.

The Background Information document is well done and provides important contextual information for the Wasaga Beach Provincial Park Master Plan.

The Town's comments focus on the questions posed in the Management Topics and Options discussion paper, which are provided below.

The Town would like the WBPP Master Planning process to consider and reflect on the Town's comments on the Beach Management Secondary Plan in 2017 as well. The Town's letter of February 27, 2017 is appended, which provided feedback on beach management and maintenance issues, such as beach management actions, beach raking (mechanical grooming), sand management, stormwater drainage outflows and erosion management, detritus, and invasive species management. There are principles outlined in those comments that should find their way into the Park Master Plan.

Section 3.1 – Purpose Statement Considerations

- The Town supports the inclusion of all of the proposed elements in the purpose statement, with specific interest in:
 - Providing a variety of accessible, high quality, year-round, ecologically sustainable ‘tourism-oriented’ recreational opportunities that support the economy of Wasaga Beach;
 - Playing an active role in the natural, cultural, economic and social health and growth of the community; and
 - Providing high quality interpretive and educational opportunities and experiences based on the park and surrounding area’s cultural and natural heritage.
- The Town looks forward to providing feedback on the draft purpose statement in the preliminary management plan when it is released for comment.

Section 3.2 – Vision Statement Considerations

- The Town supports the inclusion of all of the proposed elements in the vision statement, with specific interest in:
 - Providing outstanding, ecologically sustainable, all season, welcoming recreational and educational experiences;
 - Balancing diverse interests; and
 - Pursuing education, outreach and partnerships.
- The Town looks forward to providing feedback on the draft purpose statement in the preliminary management plan when it is released for comment.

Section 4 – Permitted Uses and Activities

- The Town understands that Ontario Parks intends to designate the beach as a smoke-free area, which presents some enforcement challenges. Currently, enforcement of smoking on the beach can only be done by a local Tobacco Enforcement Officer, under the statute of the Smoke Free Ontario Act (SFOA). The local health unit has insufficient resources to deploy Tobacco Enforcement Officer’s at Wasaga Beach. The Town recommends that Ontario Parks seek out options to give Park Wardens the authority to enforce the law. For example, could the PPCRA be amended to mirror the SFOA at this specific Provincial Park?
- The Wasaga Beach Public Library would like to encourage more emphasis on information sharing, relationship building and educational experiences with Ontario Parks in order to better promote and illuminate the wonderful park resources found in Wasaga Beach. In the past, the library has had minimal success with initiating collaborations with Ontario Parks. There are missed

- The final paragraph of this section notes that “should the Park Superintendent determine that a proposed new use or activity, or changing an existing use, **do not outweigh** the potential pressures or risks, the use or activity will not be permitted” (emphasis added).

The Town is concerned that this final decision-making framework for specific uses is too subjective. The Town would support a more collaborative approach to decision-making, where there could be discussion and the opportunity to provide supporting documentation and/or opinions about potential uses for a dialogue with Parks staff. The Town has a positive working relationship with Parks staff, and would like to maintain a mutually-collaborative decision-making process where there is opportunity for discourse. In addition, the Town as an independent government entity, should receive special consideration with respect to requests for changes to activities offered.

The Town has been at times frustrated by the limited resource allocation (staffing and capital) from the Province to operate and maintain the Provincial Park, which has presented a barrier to operations, and improvements to infrastructure and recreational facilities/amenities.

The Town recommends that the Province allocate sufficient resources to the Wasaga Beach Provincial Park, so that ‘insufficient provincial resource allocation’ is no longer a reason for the Town to shoulder the burden of operational and capital costs to maintain areas covered by agreements or permits.

Section 5 – Boundary Considerations

- The Town would appreciate the opportunity to:
 - Work with Ontario Parks staff (establish a joint staff committee) to evaluate opportunities for additions, subtractions, and/or land trades that would benefit both the WBPP and the Town in achieving our respective goals;
 - Review the proposed lands being contemplated for future addition or subtraction from the park.
 - Open a dialogue (joint committee) with Ontario Parks on the parks boundary review process prior to any legislative or statutory consultation process occurs.
 - Respectfully request that provincial park boundary mapping be shared with the Town when it is completed.
- There are municipal encroachments (roads, buildings, etc.) that occupy provincial lands which require formal agreement(s) to reflect same and/or acquisition of lands.
- The Town is of the opinion that there are a number of potential opportunities for the WBPP to dispose of lots capable of being developed for single-detached residences that could provide capital for park management purposes and tax revenue for the municipality. This should be considered as part of the final question above.

- The Town encourages the use of “Zoning” in a Provincial Park context to designate areas for different uses, given the diversity of uses within the park. This will allow the creation of policies to govern the permitted uses in the various zones
- There are parcels of land the Town has acquired over the years that contain natural features and are bordering provincial park lands. The Town would like to discuss the disposition of these lands to the park in exchange for lands the Town may be interested in.

Section 6.1 – Overnight Accommodation

- The Town believes that incorporating overnight accommodation to the provincial park is an interesting opportunity that could have a positive impact on year-round visitation, local tourism, and economic development. The Town supports further exploration of options for a wide variety of accommodations, including yurts and cabins to promote winter recreational opportunities.
- Other areas to evaluate for feasibility for potential accommodation uses are the former racetrack area, fisherman’s road area, lands within Park Areas 1 through 6 (i.e. parking areas on the spit), and Ross’s Woods in the vicinity of Springhurst Beach. Ontario Parks and the Town could explore partnership opportunities for accommodation where the Town owns lands in close proximity to the Provincial Park boundary, such as in the vicinity of the Sportspark.

Section 6.2 – Park Classification

- It is recommended that the Park Classification System remain as a Recreational Class Provincial Park. Although select sections of the park may be considered a Natural Environment Class Provincial Park, by classifying the entire Park as such may limit any potential for recreational growth/improvements within the Park Boundary. The Town seeks clarification on whether there are any further restrictions on beach maintenance practices, capital improvements, and park activation/events associated with re-classification.

Section 6.3 – Beach Access Paths

- Improved access paths should be considered along the entire length of the Provincial Park (Allenwood Beach to 71st Street). It is recommended that appropriate widths be established/re-instated per AODA Integrated Accessibility Standards. Although 3.0 metre wide paths would be preferred, existing features/vegetation may challenge the construction of same. Whichever approach, the Town could undertake consistent improvements along shoreline road allowances.

- The Ministry of Tourism Culture and Sport has been working on promoting cycle tourism throughout the province by establishing the Great Lakes Waterfront Trail. The Town and Ontario Parks staff have been collaborating with GLW trail implementers, Waterfront Regeneration Trust, to establish the route through Wasaga Beach along the Shore Lane Trail. Provincial tourism investment in signage and marketing/promotion along this route provides a good opportunity for continued collaboration to improve access points and signage for public beach access and wayfinding.

Section 6.4 – Rename the Beach Areas

- The Town is supportive of re-naming the beach areas and is supportive of consulting stakeholders to identify more meaningful names for the Beach Areas. Should re-naming be considered, a Wayfinding Strategy/Study could be undertaken in partnership between Ontario Parks and the Town of Wasaga Beach such that all signs are consistent throughout the community (and not simply on Park lands). As well, the history and evolution of the Town of Wasaga should be taken into consideration when listing potential names for each beach area.

Section 7 - Other topics to be addressed in the Preliminary Management Plan

- It is a remarkable statistic that Wasaga Beach Provincial Park hosts more annual visitors than all of the other recreational class provincial parks on the lower Great Lakes combined. Wasaga Beach has the potential to host many more visitors, with greater provincial investment in recreational and accommodation infrastructure and park operations in the provincial park. After all, provincial park revenues are driven by park visitation.

One example of provincial investment in the Park that the Town would like to see is in Shore Lane Trail improvements through the Beach Park areas 1 through 6. The Shore Lane Trail is a significant piece of recreational infrastructure that gets people to and from the Park areas, and has the potential to be a world-class trail from one end of Wasaga Beach to the other. The Town's desire is for the Shore Lane Trail to act as the active transportation backbone for the community, to which many other trails connect. The Town and Ontario Parks have collaborated well in recent years to make surface and signage improvements, but it is typically the Town making the financial investment on park property.

The Town would like to see the province step up their capital and operational investment in its most heavily used provincial park on the Great Lakes. In addition, the Town would like to see the Province become a stronger partner in marketing the beach for tourism visitation as the 'playground of Ontario'.

- Park objectives should include striking a balance between public use/recreational values, and environmental/natural heritage values on the beachfront, recognizing that the primary objective should be to facilitate public access to the beach for recreational purposes. Tools such as park zoning could be utilized in specific areas of the beach to achieve this differentiation. A healthy balance should be encouraged by policies that permit flexibility in beach management practices, respecting both the recreational use/value as well as the natural heritage values of the beach.
- The Town would like the Park Master Planning process to consider the comments the Town provided in the February 27, 2017 letter on the Beach Management Secondary Plan. To augment these comments, the Town provides the following:
 - Vegetation overgrowth in some areas of the beach has become detrimental to tourism and recreational beach use as well as beachfront property valuation. The Town would like to continue the conversation about appropriate and necessary beach maintenance practices, particularly related to piping plover habitat. There have been some recent pilots of limited maintenance in nesting areas that have shown the plovers still return to the area to nest. The Town would like to explore options for ongoing beach maintenance that respects both habitat considerations as well as recreational values on the beach.
 - Confirmation is required whether consideration will be given to blow sand management/beach erosion; particularly as it relates to the loss of beach sand where dunes/buffers do not exist to mitigate the same. This is most evident along Beach Areas 1 & 2, as well as the many road allowances (along Shore Lane) that terminate at the Provincial Park boundary. Note, Town staff install fencing in advance of each winter to help mitigate against the effects of blow sand and snow/drifted; however, a long-term strategy should be developed.
 - There is an opportunity to improve public education around protection of endangered species, specifically pro-active education to avoid eastern hognosed snake mortality.
 - The Blueberry Trails Nordic Centre is an underutilized asset that could be developed into a world-class year-round trails and interpretive centre. By drawing a comparison to the interpretive centres at Killbear, Agawa Bay, French River, the Blueberry Trails centre could highlight the local ANSI of the rare parabolic dunes, the overall geology of the land with the Nipissing Ridge, that the Town sits on a sandbar/gravel ridge built up over time which resulted in the creation of the Minesing Wetlands, the local flora and fauna and the rare and endangered species within the local natural habitat, the variety of terrain along the Nottawasaga River, and finally the significant native and early European history including the Nancy (War of 1812). There is a wealth of natural, cultural and

recreational values material to complement an interpretive centre at Blueberry Trails or elsewhere in Wasaga Beach Provincial Park.

- There is a wide variety of signage directing visitors to various beaches and points of interest in the community. There is an opportunity for the Town and Ontario Parks to partner in a consistent way-finding plan/strategy that will help guide visitors and residents to enjoy what Wasaga Beach has to offer.

The Town would like to continue to engage Parks staff in the Town's preparation of a new Official Plan for Wasaga Beach, in regards to land use designations, permitted uses, and policies such as wildland fire prevention methods/operations. Town staff and Parks staff are arranging a meeting to coordinate and discuss how to align the Town's Official Plan and the Parks Management Plan processes.

It is anticipated that staff will have opportunity to provide further/detailed comments as it relates to the pending draft policies and direction in the Preliminary Management Plan.

If you have any questions, or would like to discuss these comments further, please contact the undersigned at cao@wasagabeach.com or (705) 429-3844 ext. 2222 or Nathan Wukasch, Senior Planner, at n.wukasch@wasagabeach.com or (705) 429-3847 ext. 2273. Please take these comments into consideration in the preparation of a preliminary Wasaga Beach Provincial Park Master Plan. We look forward to working with you through further discussions and conversations about planning in Wasaga Beach.

Sincerely,



George Vadeboncoeur
Chief Administrative Officer

Enclosed: Beach Management Secondary Plan Comment Letter dated February 27, 2017

Cc: Greg Forbes, Park Superintendent, WBPP
Mayor and Council, Town of Wasaga Beach
Doug Herron, Director of Planning and Economic Initiatives
Nathan Wukasch, Senior Planner