



May 3, 2024

Ministry of the Environment, Conservation and Parks
300 Water St, 6th Flr S
Peterborough, ON
K9J 3C7

Dear MECP,

Re: [ERO #019-8310](#) – Amendment to O.Reg 316/07 to expand boundary of Bigwind Lake Provincial Park, and [ERO #019-7814](#) – Developing a management plan for Bigwind Lake Provincial Park

Ontario Nature supports providing access to experiences in nature for all. Thank you for the opportunity to provide input into the next stage of management planning for Bigwind Lake Provincial Park, along with the proposed boundary expansion.

As we noted in [our submission to ERO #019-7814](#) we are disappointed that an existing intact protected area is being developed. This decreases the area within the provincial parks system that effectively protects and maintains ecological integrity. We see this as a step backwards at a time when Ontario should be showing leadership by committing to the Ontario Biodiversity Strategy target of protecting 30% of lands and waters by 2030, and by following through on the 2021 recommendations of the Protected Areas Working Group. We provide recommendations below that may help this proposal not be another conservation loss for the province.

Proposed Boundary Expansion

We are pleased to see the proposed boundary expansion and fully support this proposal if affected Indigenous communities have been meaningfully engaged and are also in support. Nonetheless this boundary expansion does not negate the significant ecological impacts of the proposed development within the existing park.

- **We call on the government of Ontario to commit to a meaningful expansion of the protected areas system by undertaking a modern land use planning exercise that respects the rights and interests of Indigenous Peoples.**

Preliminary Management Plan

We appreciated the prompt responses from Ontario Parks staff to our requests for additional background information. After thoroughly reviewing the provided materials we have several recommendations.

Management Plan Format

We were pleased to see the novel approach to a preliminary management plan that uses text boxes to provide clarity and to summarize what public input was received and how it was considered.

- **We recommend that Ontario Parks use the Bigwind Lake Provincial Park Preliminary Management Plan as a model for all future management planning projects.**

Development Footprint and Mitigations

The proposed development footprint is alarmingly large, and much of it will have permanent impacts on some of the park's most sensitive ecosystems and species, including species at risk turtles, bats, and the Eastern Wolf. It is disappointing that the development alternatives did not make ecological integrity the highest priority.

We are also dismayed to see that the campground will be built within an area of mature forest that includes Eastern Hemlock and critical habitat for species at risk bats. Eastern Hemlock is threatened by the expected spread of the invasive Hemlock Woolly Adelgid, and Ontario Parks should be treating all existing hemlock stands as values to be carefully monitored and protected, rather than bulldozed through. Furthermore, as other protected areas like Kejimikujik National Park in Nova Scotia have learned the hard and extremely expensive way, hemlock stands are dangerous locations for recreational facilities.

- **We recommend that the government reconsiders the placement of the main campground to an area of less ecological sensitivity and constraint.**

We understand that development is proceeding. As the first new full-service operating development in over 40 years, this is an opportunity for this government to show leadership and use the most modern methods available for ecologically-sensitive design. The Final Natural Heritage Report by Dougan and Associates provides a long list of recommended mitigation measures and other considerations, as does the Environmental Considerations, Alternatives, and Mitigation Options report by GHD. We consider these recommendations to be the bare minimum.

- **We recommend that the government make a legacy investment and use Bigwind Lake Provincial Park as a model of wise development by adopting all the mitigation measures recommended by its consultants, as well as additional measures like lighting that minimizes light pollution and bird-friendly windows.**

Environmental Assessment

The loss of the important guidance provided by the *Class Environmental Assessment for Provincial Parks and Conservation Reserves* and the legislative oversight provided by the *Environmental Assessment Act* is evident in the quality of the Environmental Considerations, Alternatives, and Mitigation Options report by GHD. Only considering the “do nothing” option against one or two other options is insufficient for the scale and complexity of this undertaking. This document clearly demonstrates why the *Project Evaluation Policy* under the PPCRA will fall short in guiding ecologically-appropriate development. Once the park management plan is approved there will not be enough detail to effectively guide development in a way that minimizes impacts to ecological integrity. Furthermore, there will be no specific legislative mechanism in place to require new mitigations if new information becomes available, or to allow the public to provide further comment, even if the development is delayed for years.

- **We [continue to recommend](#) that the current *Project Evaluation Policy* be amended to include the direction provided in the previously posted *Environmental Impact Assessment Policy*.**

It is essential that development within Bigwind Lake Provincial Park be done in a way demonstrates leadership and innovation by investing in modern methods to minimize impacts to ecological integrity. Developing an existing intact park, rather than creating a new one, is a missed opportunity to truly advance protected areas in the province and we call on this government to use this moment to do more for nature, and for future generations.

Yours sincerely,



Corina Brdar
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 Ontario Nature