



October 24, 2024

Rondeau Provincial Park  
RR1  
Morpeth, ON  
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**Re: ERO ERO 019-8289 Rondeau Provincial Park Management Plan Amendment –  
Cottage Lot Leases**

We write with respect to the Proposal of the Ministry of Environment, Conservation and Parks to extend the leases for cottage lots within Rondeau Provincial Park until December 31, 2038.

In 2022, we expressed concern with the cottage lease extension to 2024 and urged the Government of Ontario to bring the cottage leases to an end to protect and restore the Park's ecological integrity. We are now expressing strong opposition to the new proposal to extend the cottage leases for another 14 years.

The Proposal provides no rationale for extending the cottage lot leases despite the fact that 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 entirely 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In 1954, when the Government of Ontario passed the now-repealed *Provincial Parks Act*, it reversed its policy of supporting private cottaging in provincial parks.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. Despite this commitment, there have been several subsequent extensions of the expiry dates, including most recently to December 31, 2024.

When the proposal to extend the leases by two years to December 31, 2024 was approved, it was stated that this was to allow time to “consult on a future options for the continued leasing of cottage lots in Rondeau Provincial Park”. At the time, we were concerned that rather than being committed to phasing out the cottages, the Government of Ontario was instead preparing to embrace long-term occupation. The current proposal to extend the lease to the end of 2038 demonstrates that this was indeed the case. That the current ERO policy proposal to extend the leases for another 14 years without a stated purpose or rationale indicates that the Government

indeed intends to step away from its long-standing commitment to phase out the cottages and allow long-term occupation instead. 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 plant). 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:

*Ontario's provincial parks and conservation reserves are dedicated to the people of Ontario and visitors for their inspiration, education, recreational enjoyment and other benefits with the intention that these areas shall be managed to maintain their ecological integrity and leave them unimpaired for future generations (Provincial Parks and Conservation Reserves Act, 2006, section 6).*

Long-term occupation of the cottage lots in Rondeau Provincial Park will mean continued negative impacts on the park's ecosystems and wildlife. According to a 2017 environmental impact assessment (Category B project under A Class Environmental Assessment for Provincial Parks and Conservation Reserves), the private cottages are causing harm to species at risk and rare vegetation communities, and leading to elevated concentrations of phosphorus and nitrates in groundwaters, the release of contaminants in soils and sediments, and erosion. The impacts are the result of cottage structures, vegetation removal and mowing, footpaths, road mortality, introduction of invasive species, predation by pet animals, and more. Long-term occupation of these cottages clearly contravenes the Government's legal duty to manage the park to leave it unimpaired for future generations.

In addition, there should be equal access to the many benefits provided by provincial parks and not to a few privileged cottagers. Sixty-seven percent of Rondeau Provincial Parks's Lake Erie shoreline is occupied by cottages, denying the people of Ontario the opportunity to enjoy these areas.

We also note that when the cottage leases were renegotiated in Algonquin Provincial Park, the fees were increased substantially. Furthermore, an agreement was made with the Algonquin Peoples of Ontario and compliance conditions for maintaining ecological integrity were placed on the leases. There is no evidence that the Ministry of Environment, Conservation and Parks has planned any such measures for the Rondeau Park cottage leases that would demonstrably mitigate impacts on ecological integrity. Nor is it evident that the Ministry has consulted meaningfully with Indigenous communities.

Rondeau Provincial Park is a small area of exceptional biodiversity value. We urge the Government to, at a minimum, prohibit the transfer of leases, or prohibit the sale of cottage properties, so that the Government can begin the process of removing cottages from the park by purchasing from current owners. Ideally, we request that the Government bring an end to cottage leases in the park and turn its attention to restoring its ecological integrity in accordance with the *Provincial Parks and Conservation Reserves Act, 2006*.

Yours Truly,



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Tim Gray  
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