



January 26, 2025

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Dear Kendra,

We would like to congratulate Ontario Parks on the establishment of Uxbridge Urban Provincial Park (UUPP) and for preparing a management plan for the park so quickly. We appreciate this opportunity to comment on the Preliminary Management Plan which will form the basis for the final management plan direction. Please accept the following comments on behalf of Ontario Nature, North Durham Nature, Durham Region Field Naturalists, Thickson's Woods Land Trust and Pickering Naturalists.

It is vital that the UUPP Management Plan upholds the legal requirement under the Provincial Parks and Conservation Reserves Act to manage for ecological integrity and to consult with Indigenous Peoples. Given the Park's location adjacent to Canada's largest population centre and it is imperative that the Plan provides strong measures to ensure that biodiversity and key freshwater resources are protected.

The following are our specific comments and recommendations:

### **Vision**

Section 3 of the PPCRA establishes principles that guide all aspects of the planning and management of Ontario's system of protected areas. Given that "the maintenance

of ecological integrity shall be the first priority and restoration of ecological integrity shall be considered”, the vision as currently written is inadequate. At the least, the statement “...that natural ecosystems be maintained and enhanced...” should be the first bullet and stand alone (i.e., not included with the other points related to research and learning). The point should also be expanded to include that UUPP be a space that will allow natural ecosystems to be maintained and enhanced to conserve and restore the region’s native biodiversity and groundwater. The Protection Objectives address this but it is important that it is reflected in the vision.

## **Maps**

- The Plan should include a vegetation cover map that clearly delineates habitat types for clarity and easy reference.
- Maps should include relevant information e.g., the trail network map (fig. 5) should include the zones as labelled in the zoning map (Figure 4) i.e., the zone map should be the basemap for other maps such as the trail network.

## **Duration of the Preliminary Management Plan**

The Planning context section (p. 6) states that the management plan is intended to guide park management for the next 20 years. It is not clear why the plan is ‘preliminary’. It is important to clarify the process and wording to ensure that the public knows what ‘preliminary’ means i.e., is it a draft of what will be the final management plan pending public and First Nation consultation or is it a precursor to a more extensive plan?

## **Park Classification**

The PPCRA states that the objective of recreational class parks is to provide a wide variety of compatible outdoor recreation opportunities in attractive natural surroundings. The Recreational Class Park classification does a disservice to the Park’s protection objective. It is critical that any new classification of park is clearly consistent with the currently stated protection objectives and minimize or eliminate activities incompatible with biodiversity and ecological integrity objectives.

## **Incompatible Uses**

### **• Maple Syrup Operation**

The intensive maple syrup operation within Zone NE2 is incompatible with conservation objectives. On-site inspection revealed that this is an industrial operation with almost every tree tapped with multiple taps and an extensive network of tap lines with the entire area of the operation. Greater protection should be considered for this zone. The maple syrup operation is within the Uxbridge-Glen Major ANSI. The forest includes old growth forest with maple and hemlock. We understand that the maple sugar operation is subject to a 5-year lease. The lease

should be terminated once the current lease term ends and the area of the forest currently tapped restored to its natural state.

- **Recreational Trails**

There is no information regarding which trails may be used by bicycles and pedal assist bikes but simply that they are permitted within the park. The current trail map (Figure 5) provides no information on permitted trail use. Trails used by mountain bikes or pedal assist bicycles are incompatible with hiking and walking and can pose a significant hazard to such users. They are likely to also damage native vegetation and facilitate the dispersal of invasive species. The impact of trails for the spread of invasive species should be addressed to minimize their incursion into sensitive and interior habitats. The need for some quiet trails to be designated for nature appreciation (birdwatching etc.) should be emphasized.

The description indicating where equestrian use is permitted is inadequate and inaccurate. The Plan states that “Equestrian use is permitted in NE1, only in the two following areas:

- “Trails located in Lot 21 and 22, between Concession Road 6 and Regional Highway 47.
  - access from Concession Rd 6, north of Wagg Road
- Trails located in Lot 17 and 18 (partial), between Concession Road 6 and 7.
  - access from Concession Rd 7, at Reid Road”

The only trail marked in NE1 starts on Concession 7. The trail described above indicating its location as between Concession Road 6 and Regional Highway 47 (with an entrance point from Concession 6 north of Wagg Road) is not on the trail map and not within Zone NE1.

### **Restoration**

The Plan states that “Planning and management principles in the PPCRA establish that maintenance of ecological integrity shall be the first priority, and restoration of ecological integrity shall be considered” and that “This management plan identifies site-specific management policies and actions intended to maintain or, where possible, restore ecological integrity”.

We appreciate the focus on ecological restoration in the Plan. It is vital in landscapes, such as the UUPP setting, that enhancing ecological integrity be a goal and specifically target restoration of agricultural fields and plantation forests.

Plantations make up a significant part of the current park land parcels. Although plantation management is referred to in various part of the plan, the plan should specify

the benefit to biodiversity that would result from transition to natural forest. This can be undertaken through ecological restoration techniques such as thinning and removal of plantation trees to allow these areas to revert to natural forest cover over time.

Agricultural leases should end, and ecological restoration undertaken promptly.

### **Ecological Connectivity**

Given the stated purpose of the UUPP to provide connection across the Oak Ridges Moraine – connection between natural and recreational networks in other natural protected space; connection with the adjacent urban area, and connection between people and nature – it is important that ecological integrity and connectivity have primacy in the plan. The plan should expand on the ecological connectivity across the broader landscape. Even if it isn't within the immediate purview of Ontario Parks, this is crucial in terms of understanding the importance of the park in enhancing connectivity within the broader landscape, especially when additional lands may be added to park e.g., TRCA lands which we understand the TRCA Board has approved for transfer to the park.

The management plan should address the enhancement of connectivity within existing parcels through ecological restoration and the potential for enhancing connectivity between parcels through securement of additional properties to add to the park directly or through fee simple and conservation easements acquired by in partnership with local partners such as Green Durham Association, the local Conservation Authorities and the Oak Ridges Moraine Land Trust.

Ontario Parks should collaborate with Parks Canada to develop and implement a strategy and plan to secure properties and foster stewardship by private landowners to enhance ecological connectivity between Uxbridge Urban Provincial Park and Rouge Urban National Park. Connectivity planning should also incorporate best practices from road ecology studies and address any needs for Eco-passages.

### **Indigenous Communities and First Nations**

Ontario Parks should ensure comprehensive and respectful consultation with First Nations within whose Traditional Territories UUPP lies to ensure that Indigenous rights and values are fully reflected in the Park's management. Opportunities for co-governance should also be explored.

In conclusion, we look forward to a robust management plan backed by sufficient resources and effective mobilization of volunteers that will enable Uxbridge Urban Provincial Park to withstand the pressures from Canada's largest population centre to protect biodiversity effectively and contribute to the protection of the Oak Ridges Moraine's freshwater resources.

Sincerely,

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**James Kamstra**

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