

<https://ero.ontario.ca/notice/025-0694?page=9#comment-153026>

Subject: Opposition to ERO 025-0694 – Proposed Removal of Protections and Transfer of Crown Lands in Wasaga Beach

Dear Ministry of Natural Resources and Forestry,

I am writing to express serious concern regarding the proposed amendment under ERO 025-0694, which would strip protections from nearly one-third of Wasaga Beach Provincial Park — encompassing over 645 acres of vital wetlands, dunes, forests, and public beaches. These lands are not surplus. They are ecologically essential.

This area is not only a cherished natural space enjoyed by millions of Ontarians and visitors to Georgian Bay for its unspoiled beauty, but it also provides critical habitat for endangered and threatened species, including the piping plover, red-sided dace, red-headed woodpecker, and Blanding's turtle. Legislative changes in recent years have already weakened Ontario's Endangered Species Act, making this proposal particularly alarming in its potential to further erode protections for at-risk wildlife.

The proposed removal of Beach Areas 1, 2, New Wasaga, and Allenwood from the Provincial Parks and Conservation Reserves Act (PPCRA) would result in the loss of park status and protections for large, ecologically sensitive sections of Wasaga Beach. These areas are not just recreational lands — they form part of a critical shoreline ecosystem and serve as some of the last remaining coastal wetlands in southern Ontario. Over 70% of the region's original wetlands have already been lost. Wetlands like these filter water, store carbon, and blunt the force of increasingly severe flooding. Their removal from park status to accommodate development contradicts both climate science and public interest.

The government's related proposal to sell Crown-owned lands within these beach areas to the Town of Wasaga Beach is also deeply concerning. Crown lands are held in public trust and, more importantly, are subject to Indigenous rights and responsibilities. These parcels fall within the traditional territories of Indigenous Nations including Beausoleil First Nation and the Métis Nation of Ontario. Under Section 35 of the *Constitution Act, 1982*, and in keeping with the Honour of the Crown, no such transfer should proceed without free, prior, and informed consent of the impacted Nations. This duty to consult cannot be dismissed as a procedural formality. It is a legal and moral obligation.

Further, the proposal to transfer Nancy Island from the PPCRA to the Heritage Places Act (HPA) — placing it under the Ministry of Tourism, Culture and Gaming — also risks weakening the environmental protections currently in place. Nancy Island, as part of the broader park ecosystem, contributes to the integrity of the dune and wetland system. Its removal from park protection fragments that system and raises questions about the long-term conservation of its natural features. While the intention may be to enhance tourism, this cannot come at the

expense of ecological degradation. Tourism that erodes the very beauty it depends on is not sustainable.

Although the Ministry indicates it will retain ownership of the lake and riverbed portions of the park, this is not sufficient to protect the integrity of the surrounding ecosystem. Healthy shorelines and aquatic environments depend on the health of adjacent lands. Fragmenting and privatizing these upland areas will only increase runoff, pollution, and habitat loss.

Despite repeated public backlash to past proposals involving protected lands, this pattern continues; fast-tracked development justified under the banner of “economic revitalization.” But Ontario cannot build its economy by undermining its ecological foundations. These lands are not blank spaces on a development map. They are living, functioning systems, and the consequences of dismantling them will be long-lasting and irreversible.

I strongly urge the Ministry to withdraw this proposal in its entirety and maintain full protections for Wasaga Beach Provincial Park. Safeguarding these lands is not a barrier to growth - it is the bedrock of any sustainable future. Conservation, climate resilience, and public trust must remain guiding principles in decisions involving Ontario’s parks and Crown lands.

Thank you for your consideration of this important issue.

References

1. **Ontario Parks – Wasaga Beach Provincial Park**
<https://www.ontarioparks.com/park/wasagabeach>
Overview of the park’s natural features, recreational opportunities, and ecological significance.
2. **Species at Risk in Wasaga Beach Area**
<https://www.ontario.ca/page/species-risk>
Information on endangered and threatened species, including piping plover and Blanding’s turtle, found in Ontario.
3. **Ontario’s Wetlands and Climate Change**
<https://www.ontario.ca/page/wetlands>
Explains the critical role wetlands play in carbon storage, flood mitigation, and biodiversity support.
4. **Impact of Wetland Loss in Southern Ontario**
<https://www.natureconservancy.ca/en/where-we-work/ontario/featured-projects/ontario-wetlands.html>
Details on the significant loss of wetlands in southern Ontario and its environmental consequences.

5. **Bill 5: Protecting Ontario by Unleashing Its Economy Act**
<https://www.ontario.ca/laws/statute/s23005>
Summary of recent legislative changes affecting environmental protections in Ontario.

6. **Climate Change Action in Ontario**
<https://www.ontario.ca/page/climate-change-action-plan>
Ontario's current climate targets and progress reports.