

Environmental Registry of Ontario Submission

Subject: Proposed Amendment to the Devil's Glen Provincial Park Management Plan — Change in Classification and Climbing Access

ERO Number: 019-8238

Date: September 18, 2025

1. Introduction

Devil's Glen Provincial Park is a provincially significant protected area within the Niagara Escarpment World Biosphere Reserve. The park contains ecologically sensitive cliff ecosystems, mature forests, and wetland habitats. It is also home to one of the largest known bat hibernacula in Ontario, supporting multiple species at risk, including Little Brown Myotis (*Myotis lucifugus*), Northern Myotis (*Myotis septentrionalis*), and Tri-colored Bat (*Perimyotis subflavus*), all listed as Endangered under Ontario's *Endangered Species Act, 2007*.

At the outset, I must note that I consider this proposal incomplete. Prior to the release of the draft amendment, I requested additional information from multiple Ontario Parks staff. Specifically, I asked for information on a focused values assessment that addressed the potential impacts of rock climbing at Devil's Glen. To date, that information has not been made available. In my view, a comprehensive values assessment is essential to ensuring that decisions about climbing access are informed by science and rooted in the park's ecological priorities.

The proposed change in park classification from "Recreational" to "Natural Environment" is not inherently protective if the accompanying management direction allows for increased cliff-based recreation, bolting, and route development without rigorous ecological safeguards. Without clear restrictions, this change risks undermining ecological integrity, as defined under the *Provincial Parks and Conservation Reserves Act, 2006 (PPCRA)*.

2. Quoted Clause of Concern — Management Agreements

The Operational Policies section of the amendment proposal contains the following clause:

"Ontario Parks may enter into a formal agreement with a climbing club to manage this use."

This language raises concerns, as it would allow organizations with a strong interest in recreational use to hold influence over park management decisions. Such arrangements could create situations where the priorities of ecological protection and recreational advocacy are not fully aligned.

3. Risks of Conflicts of Interest

An example is the Ontario Alliance of Climbers (OAC), which has been actively advocating for expanded climbing access in Devil's Glen. While stakeholder consultation is both valuable and necessary, granting formal management authority to groups with a vested interest in increasing recreational access could make it more difficult to ensure that ecological integrity remains the primary priority, as required under the PPCRA (s.3(1)).

Potential consequences include:

- Difficulty enforcing restrictions in sensitive ecological zones.
- Policy shaped in ways that could unintentionally prioritize recreation over species protection.
- Undermining of staff authority and scientific recommendations.
- Reduced public confidence in the impartiality of park management.

4. Ecological Significance of Devil's Glen

a. Cliff Ecosystems

- Rare cliff-specialist plants (*Asplenium* spp., *Polypodium* spp.).
- Nesting sites for cliff-dwelling birds and roosting crevices for bats.
- Ancient Eastern White Cedars, some over 800 years old.

b. Bat Hibernacula

- Endangered bats overwinter and rear young in cliff and talus features.
- Disturbance during maternity or swarming can cause roost abandonment.

c. Sensitive Soils & Vegetation

- Erodible cliff-top soils prone to compaction and invasive species spread.

5. Documented Impacts from Recreational Climbing in Devil's Glen

Ontario Parks staff and independent observers have recorded:

- Loss of cliff vegetation on climbing routes.
- Cutting of limbs and removal of trees for route access.
- Garbage accumulation in crevices.
- Introduction of invasive plants at climbing bases.
- Permanent damage to cliff rock surfaces from bolting and cleaning.

6. Risks of Downgrading Protective Measures

If reclassification coincides with expanded climbing and potential management involvement by advocacy groups:

- **Habitat Loss** — Destruction of rare plant and invertebrate microhabitats.
- **Bat Disturbance** — Disruption during maternity and hibernation seasons.
- **Erosion & Invasives** — Increased degradation from concentrated foot traffic.
- **Precedent Risk** — Other sensitive parks could face similar pressures.

7. Legislative and Policy Obligations

- **PPCRA, s.3(1)**: Ecological integrity is the first priority.
- **Endangered Species Act**: Protects bat roosting features from harm.
- **Conflict of Interest Principles**: Public land management must remain impartial and science-based.

8. Recommended Actions

1. Remove or reword the management agreement clause to explicitly prevent special-interest recreation groups from assuming management roles.
2. Retain Ontario Parks as the sole authority for park management, supported by independent scientific oversight.

3. Maintain and strengthen climbing restrictions in ecologically sensitive zones.
4. Designate and seasonally protect bat roosting zones.
5. Prohibit bolting, route cleaning, and vegetation removal in rare plant habitats.
6. Implement independent ecological monitoring with publicly available reporting.

9. Conclusion

The proposed “management agreement” clause risks creating conflicts of interest that could weaken protections for one of Ontario’s most ecologically significant parks. Combined with loosened climbing restrictions, this would place species at risk and rare ecosystems in jeopardy. Ontario Parks must ensure that park management remains independent, science-based, and focused on the legislated priority of ecological integrity.

I respectfully urge the Ministry to:

- Remove the management agreement clause as written.
- Strengthen ecological protections in Devil’s Glen.
- Ensure all decisions uphold the PPCRA mandate for ecological integrity above all else.