

September 19, 2025

Ontario Parks – Southwest Zone Office  
659 Exeter Road  
N6E 1L3  
London, ON

**Re: [ERO #019-8238](#) Amendment to the Devil’s Glen Provincial Park Management Plan**

Thank you for the opportunity to provide input on the proposed amendments to the Devil’s Glen Provincial Park (DGPP) Management Plan. Ontario Nature and the undersigned support the proposed boundary expansion and the park’s reclassification to a Natural Environment Park. These changes demonstrate a commitment to strengthening the protection of Ontario’s most significant natural heritage and reflects the park’s role as an important link in the Niagara Escarpment.

However, we have concerns regarding the proposed introduction of rock climbing as a sanctioned activity.

Rock climbing has been a non-conforming activity at DGPP for decades, with its impacts well documented. There are ongoing reports of climbing activities in closed sensitive areas, impacting species at risk habitat, and damaging old-growth trees, talus rock and rare cliff species. Based on the findings from DGPP’s last available life science inventory (2008), “human use and increased visitation” were identified as key pressures to the park’s natural features, with warnings within the current DGPP Management Plan that, if continued, these could cause “considerable damage to sensitive cliff, rim and talus” (p. 8). Ontario Parks recognizes that the “Devil’s Glen cliff area is highly saturated with existing climbing routes” and the need to create new routes is “generally low”. Ontario Parks staff have reported constant issues with new climbing routes being developed without authorization in “locations of rare and sensitive cliff species that the lands were acquired to protect.”<sup>1</sup> Now, the park is speckled with over 130 climbing routes, established without prior knowledge to sensitive values. The existing park management plan already has policies that were supposed to prevent climbing and related impacts, yet this has not been effectively

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<sup>1</sup> Berlo, Trina. “Climbing Access in ‘Protection Areas’ Granted without Explanation.” *The Creemore Echo*, 23 Feb. 2024, [creemore.com/2024/02/23/climbing-access-in-protection-areas-granted-without-explanation/](https://creemore.com/2024/02/23/climbing-access-in-protection-areas-granted-without-explanation/).

implemented, monitored or enforced. The plan amendment does not provide any meaningful solution to deal with the existing overuse issues by climbers, simply proposing additional parking to accommodate climbers. This recreational use represents a direct conflict with the park's ecological protection objectives and runs contrary to the purpose of the *Provincial Parks and Conservation Reserves Act*.

In recent years, Ontario Parks staff conducted ecological assessments to identify sensitive vegetation and wildlife species within the unauthorized climbing areas, advising that ecological protection zones be implemented. It appears these protection zones were not implemented, and signage was removed by park managers even though climbing has never been permitted within the park.

The property proposed for the park addition was purchased 25 years ago by the Nature Conservancy of Canada for long-term protection of its outstanding natural heritage contributions. Ontario Parks should honour the management intent of ensuring ecological integrity of this property.

While we applaud the park expansion and protection objectives in the amended management plan, we urge Ontario Parks to manage the park to prioritize ecological integrity above other factors and ensure appropriate monitoring and enforcement of potential impacts.

We offer the following recommendations to strengthen the DGPP Management Plan:

### **Enforcement Strategy**

The amended DGPP Management Plan fails to detail how Ontario Parks intends to enforce compliance and ensure visitors respect the new climbing rules. The plan briefly refers to enforcement as an action that may be implemented (sec. 7.8), and if implemented would be a short-term priority (sec. 12, Table 1). A clear strategy for enhanced monitoring and enforcement, including a commitment to increase patrols with sufficient funding, are necessary steps to balance competing interests and priorities. To ensure sensitive areas are adequately protected, it will be critical for Ontario Parks to better integrate enforcement activities with input from its ecological and conservation studies.

### **Transparent, Science-based Designation of Authorized Climbing Routes**

Prior to the amendments, none of the known rock-climbing routes developed ad-hoc by climbers within the Devil's Glen cliff area were formally evaluated to avoid areas of

significant natural values.<sup>2</sup> Now, according to the amended Management Plan, the only requirements for designating routes are that they are accessible by trail, within park boundaries and can sustain climbing activities “without impacting park values”. Since the latter condition is not defined, we recommend Ontario Parks implement a standardized assessment process to ensure clarity in the designation of authorized routes.

For instance, like the process for route closure (DGPP Management Plan, Appendix III), the process for designation should also trigger a two-part ecological assessment, where all authorized routes must demonstrate 1) no presence of sensitive or at-risk species or ecological communities and 2) no negative impacts to such values if climbing activities are to be authorized. Until standardized assessments occur, the route should be closed immediately until impacts to ecological values are better understood.

### **Clear and Transparent Public Communication**

Ontario Parks has committed to prioritizing clear and effective communication with the public and climbing community to raise awareness of amendments and ensure sanctioned activities do not threaten or degrade park values. Unfortunately, the recent removal of protective signage without transparency does not fulfill this commitment. We recommend Ontario Parks reinstall removed signage at the original closed routes and publish a clear map detailing the precise location and number of proposed climbing routes. We also recommend developing and publishing a framework of agreement between Ontario Parks and the climbing community to improve transparency around decisions.

The above recommendations outline a path to permitting rock climbing in a manner that genuinely balances recreation with the need to protect at risk species and sensitive ecosystems. The park’s new Natural Environment classification prioritizes the protection of provincially significant natural heritage, while providing high-quality recreation as a secondary goal. We therefore urge Ontario Parks to address these recommendations prior to finalizing the proposed amendments to the DGPP Management Plan.

Ontario Parks needs to improve its commitment to working with all stakeholders as part of this park management planning process, as well as implementation of related policies. The public is aware of meetings between the Ontario Alliance of Climbers and

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Ontario Parks leading up to the proposed park management amendments, however similar requests for input from the local conservation community have been ignored. This does not represent a fair or balanced approach to provincial park management, particularly in an area as ecologically significant and sensitive as Devil's Glen.

Thank you for the opportunity to comment and we look forward to your response.

Sincerely,

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**Robin Harmer**  
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**Headwaters Nature**  
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