

September 11, 2025

Ontario Parks – Northeast Zone Office  
933 Ramsey Lake Road  
4<sup>th</sup> Floor, Willet Green Miller Centre  
Sudbury, ON

**Re: ERO [#025-0424](#) - Amendment to Ontario Regulation 316/07 under the Provincial Parks and Conservation Reserves Act, 2006 to remove land from French River and Grundy Lake Provincial Parks**

We, the three undersigned organizations, appreciate the opportunity to comment on ERO #024-0424, which proposes to deregulate areas from both the French River and Grundy Lake provincial parks. We understand these changes are needed to expand Highway 69 to four lanes, but are concerned that there is no mention of expanding these provincial parks elsewhere to offset the lost park area.

Just last year, through [ERO #019-8618](#), the province of Ontario proposed to expand the protected areas system by establishing new lands to be protected under the *Provincial Parks and Conservation Reserves Act* (PPCRA). The goal of classifying provincial parks and nature reserves under the PPCRA is for the permanent protection of Ontario's most significant and vulnerable cultural and natural heritage. To date, regulations of these proposed expansions have not been put forward and this proposal combined with the [recent proposal](#) for Wasaga Beach Provincial Park is resulting in a loss of provincial park area.

This proposal includes no information on the quality or sensitivity of the proposed lands for deregulation within the two provincial parks. Reducing the park boundaries, no matter how small, with no explanation of environmental impacts and no plans to expand park boundaries elsewhere is contrary to the PPCRA, specifically s. 6, whereby "these areas shall be managed to maintain their ecological integrity and to leave them unimpaired for future generations." Additionally, this proposal does not include potential impacts to remaining park lands due to highway and landfill expansion, or railway realignment.

The Management Plan for French River Provincial Park states that the expansion of existing roads, rail and utility line crossings along the French River may be permitted, but that prior to disposing of parklands for these purposes, the Ministry will ensure that:

- all reasonable alternatives have been considered;
- wherever possible, new crossings are located next to existing crossings of the same type;
- impacts on Park heritage values and on the River's scenic and unspoiled quality are minimized.

The proposal does not clarify how the above conditions are to be met, particularly on how impacts to the French River will be minimized.

Lastly, the proposal provides no information on if the Ministry of Environment, Conservation and Parks will work with the Ministry of Transportation and CN to identify opportunities to improve wildlife crossing infrastructure as part of the highway expansion and railway realignment. A four-lane highway will likely increase road mortality for wildlife, while increasing safety risks for drivers. As part of any proposed highway expansion and railway realignment, improved wildlife barriers, culverts, underpasses and potential elevated crossings (as currently exists near Killarney Provincial Park) should be implemented.

We urge the Ministry of Environment, Conservation and Parks to provide additional information on the potential environmental impacts of this proposal so that groups can provide informed comments. Additionally, we urge the Ministry to identify lands to expand French River and Grundy Lake Provincial Parks by an equivalent area to that being lost in this proposal and to work with the Ministry of Transportation and CN on improved wildlife crossings to maintain ecological connectivity.

Sincerely,

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Campaigns Director*  
Ontario Nature



**Miranda Virtanen**  
*Executive Director*  
Junction Creek  
Stewardship Committee

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*Comité d'intendance  
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**Glenda Clayton**  
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