

## **Bruce Trail Conservancy Comments on Environmental Registry of Ontario Proposal Notice Number 019-9306**

The Bruce Trail Conservancy (BTC) appreciates the opportunity to comment on the Ministry of Environment, Conservation and Parks proposal for the Environmental Registry of Ontario Posting 019-9306. As the stewards of a continuous public footpath that encompasses more than 1,400 km of trails along the Niagara Escarpment UNESCO World Biosphere, the BTC works collaboratively with landowners, including the Province of Ontario, to protect, maintain, and enhance public access to nature while supporting ecologically responsible recreation.

The Bruce Trail and certain associated side trails are currently located on some of the parcels identified in this proposal. These parts of the Bruce Trail network are maintained and monitored through a combination of formal agreements, landowner permissions, and the long-standing commitment of trained volunteers. The BTC recognizes the value of increased protection for natural areas and applauds the actions the Ford government has taken to date. That said, through this consultation we hope to emphasize the importance of ensuring continued clarity around trail management authority, public access rights, and operational processes following the transfer of jurisdiction.

Our feedback below is intended to ensure that the Bruce Trail network remains safe, sustainably managed, clearly permitted, and publicly accessible on the affected lands. We respectfully request that Ontario Parks work in partnership with the BTC and the respective local Bruce Trail Club to establish management coordination processes that support seamless stewardship during and after land transfers.

### **General Comments Applicable to All Sites**

The BTC would like to ensure continued protection and permanence for the Bruce Trail on the affected parcels and request that all future related management decisions take into consideration the tremendous effort involved by BTC staff and volunteers in routing, maintaining and monitoring the Bruce Trail. We ask that any additional permissions or processes that would impact the timely nature of these functions be carefully considered and developed in conjunction with the BTC and the local Bruce Trail Club to ensure continuity in the safe operation and stewardship of the Bruce Trail and all associated side trails located within the affected parcels.

To maintain consistency and public wayfinding across the Bruce Trail network, we request that existing Bruce Trail blazing, signage, trail markers, and infrastructure remain in place, and that any future modifications be coordinated with the BTC. Consistency in wayfinding is essential for the visitor experience and safety across the 1,400 km of trail within the Bruce Trail network.

We also encourage the province to ensure adequate enforcement capacity and visitor education following transfer of jurisdiction, particularly in areas where recreational hunting may be permitted. As a high-use public footpath, risk management and public safety remain core considerations for BTC stewardship. We believe hunting is incompatible with a safe hiking experience and in the interest of hiker safety the BTC opposes the proposal to extend or continue hunting rights to any existing or proposed lands.

We encourage the Provincial government to properly resource Ontario Parks in order to provide capacity to enforce permitted uses throughout all Provincial Parks and Conservation Reserves.

The BTC acknowledges Indigenous rights and interests in these lands and supports collaboration and coordination where shared stewardship approaches are appropriate.

## **List of Proposed Transfer Lands that Contain the Bruce Trail and Additional Comments**

### **31. Boyne Valley Provincial Park Addition**

This proposal includes new lands to be added to the Boyne Valley Provincial Park that contain approximately 1.8 km of Primrose Loop Side Trail.

One of the primary concerns of the BTC is to ensure safe use of the Bruce Trail. This proposal would extend hunting permissions to include the existing areas of the Boyne Valley Provincial Park, which we believe is incompatible with a safe hiking experience. We would also like to note that a large elementary school backs on to one of the parcels to be added here, which raises concern about the safety of the students. In the interest of public and hiker safety the BTC opposes the proposal to extend hunting rights to the Boyne Valley Provincial Park, for any existing or proposed lands.

### **32. Duncan Escarpment Provincial Park Addition**

This proposal includes new lands to be added to the Duncan Escarpment Provincial Park that contain approximately 500 m of Bruce Trail Optimum Route (the ideal proposed location for the main Bruce Trail) and 1.5 km of the Chuck & Pat Grant Side Trail.

### **34. Nottawasaga Lookout Provincial Park Addition**

This proposal includes new lands to be added to the Nottawasaga Lookout Provincial Park that contain approximately 500 m of the main Bruce Trail.

### **35. Pretty River Provincial Park Addition**

This proposal includes new lands to be added to the Pretty River Provincial Park that contain approximately 90 m of the main Bruce Trail and 100 m of the Pretty River Access Side Trail.

One of the primary concerns of the BTC is to ensure safe use of the Bruce Trail. This proposal would continue hunting permissions within the Pretty River Provincial Park, which we believe is incompatible with a safe hiking experience. In the interest of public and hiker safety the BTC opposes the proposal to continue hunting rights to the Pretty River Provincial Park, for any existing or proposed lands.

### **38. Beaver Valley Lowlands Conservation Reserve**

This proposal includes the creation of the Beaver Valley Lowlands Conservation Reserve, which will contain approximately 1 km of the Fairmount Side Trail.

### **40. Hoggs Falls Conservation Reserve**

This proposal includes the creation of the Hoggs Falls Conservation Reserve, which will contain approximately 7.5 km of the main Bruce Trail and 2.5 km of Bruce Trail side trails, including the Upper Beaver Valley Side Trail, Uplands Meadow Side Trail, Boyne River Crossover Side Trail and East Back Line Side Trail.

### **41. Kolapore Uplands Conservation Reserve**

This proposal includes the creation of the Kolapore Uplands Conservation Reserve, which will contain approximately 2.9 km of the main Bruce Trail and 190 m of Bruce Trail side trails, including the Metcalfe Crevice Side Trail.

### **42. Len Gertler Conservation Reserve**

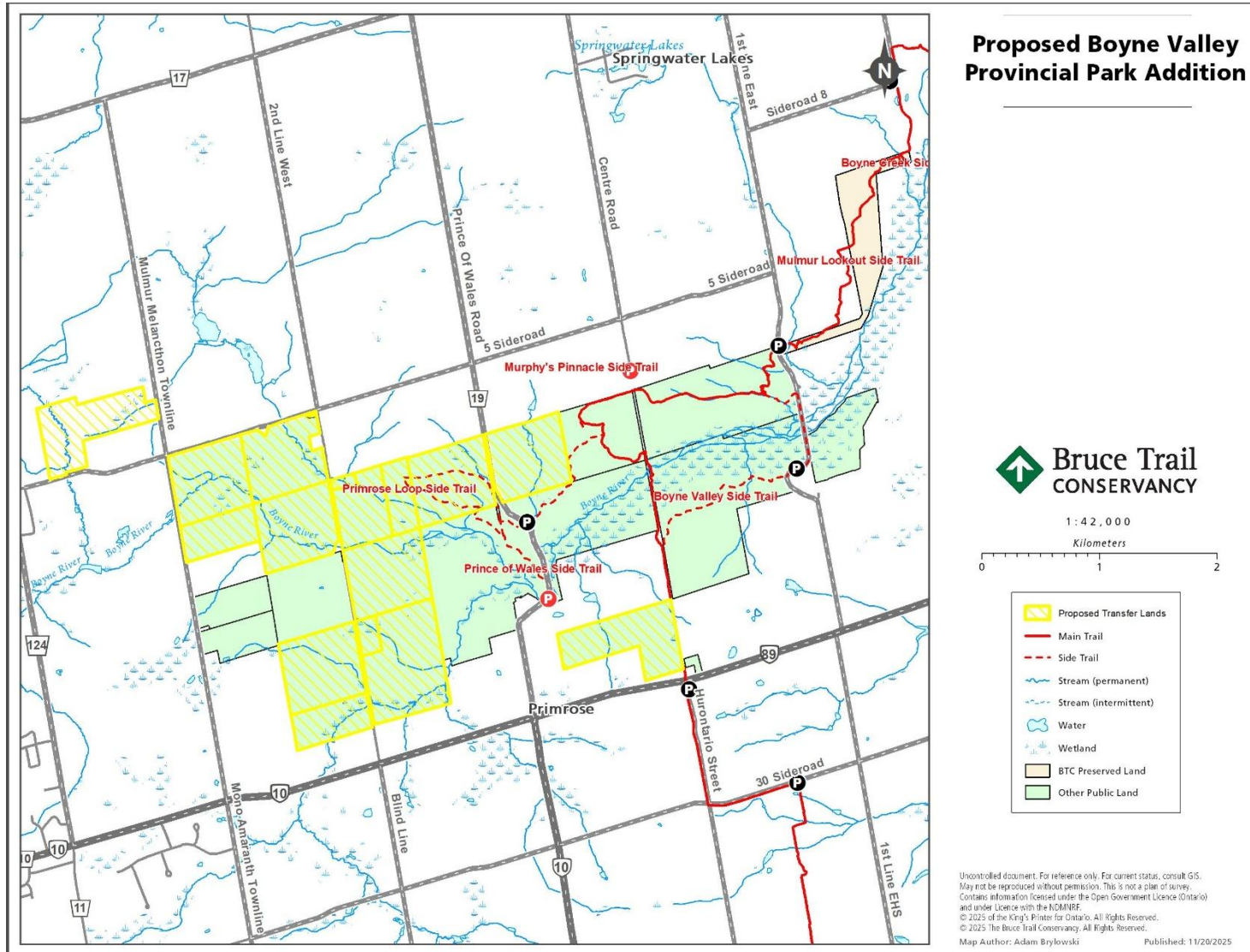
This proposal includes the creation of the Len Gertler Conservation Reserve, which will contain approximately 3.3 km of the main Bruce Trail and 2.1 km of Bruce Trail side trails, including the Len Gertler Connector Side Trail and Len Gertler Side Trail.

## **Conclusion**

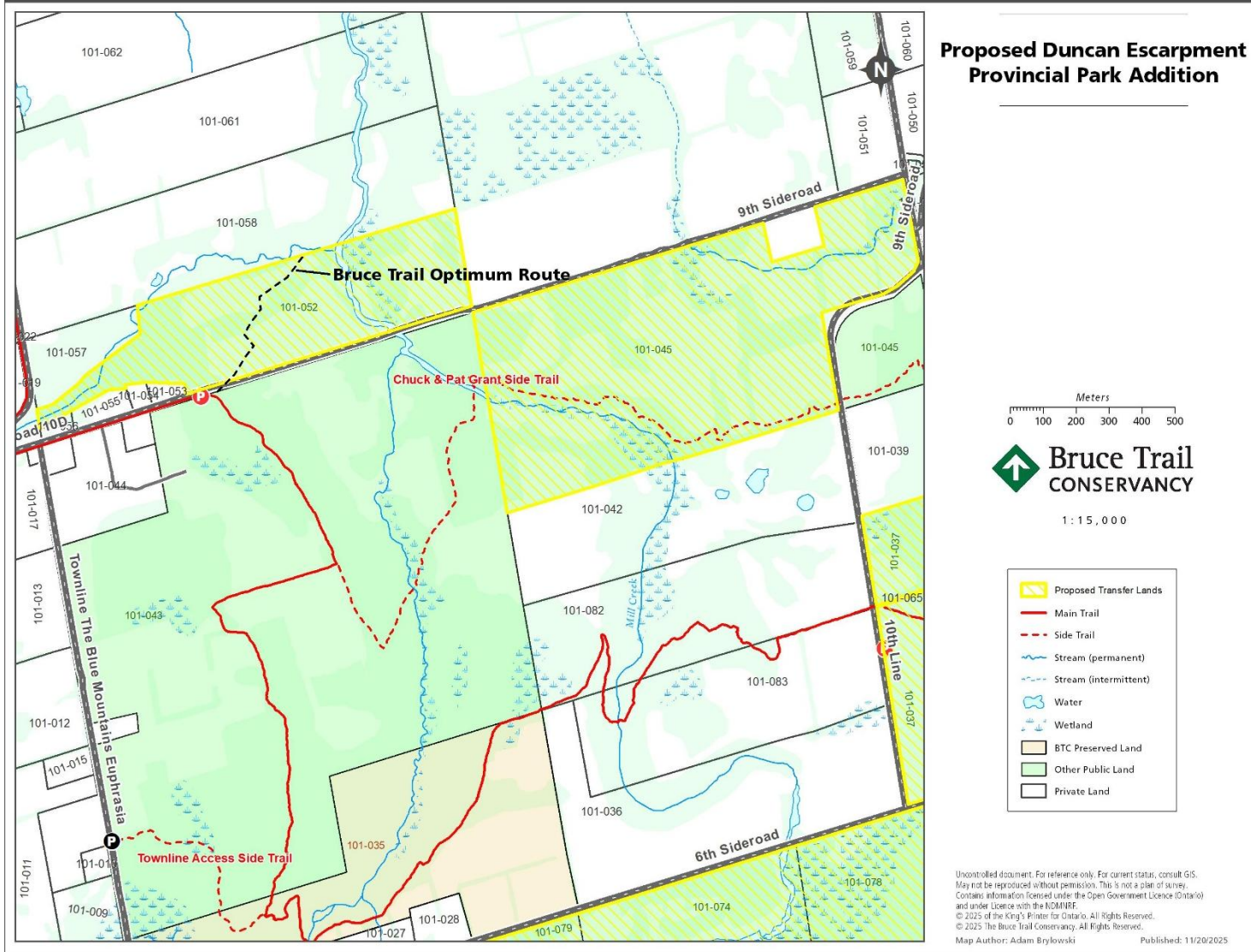
In closing, the Bruce Trail Conservancy supports the intent to increase environmental protections and recognizes the future value these transfers may provide in securing natural heritage values across Ontario. To ensure clarity for land managers, partners, and the public, we urge Ontario Parks to establish collaborative implementation processes with the BTC. Through this ongoing partnership, we can continue to protect ecologically significant landscapes while maintaining safe, sustainable public access to the Bruce Trail for future generations.

# Appendix 1 Maps

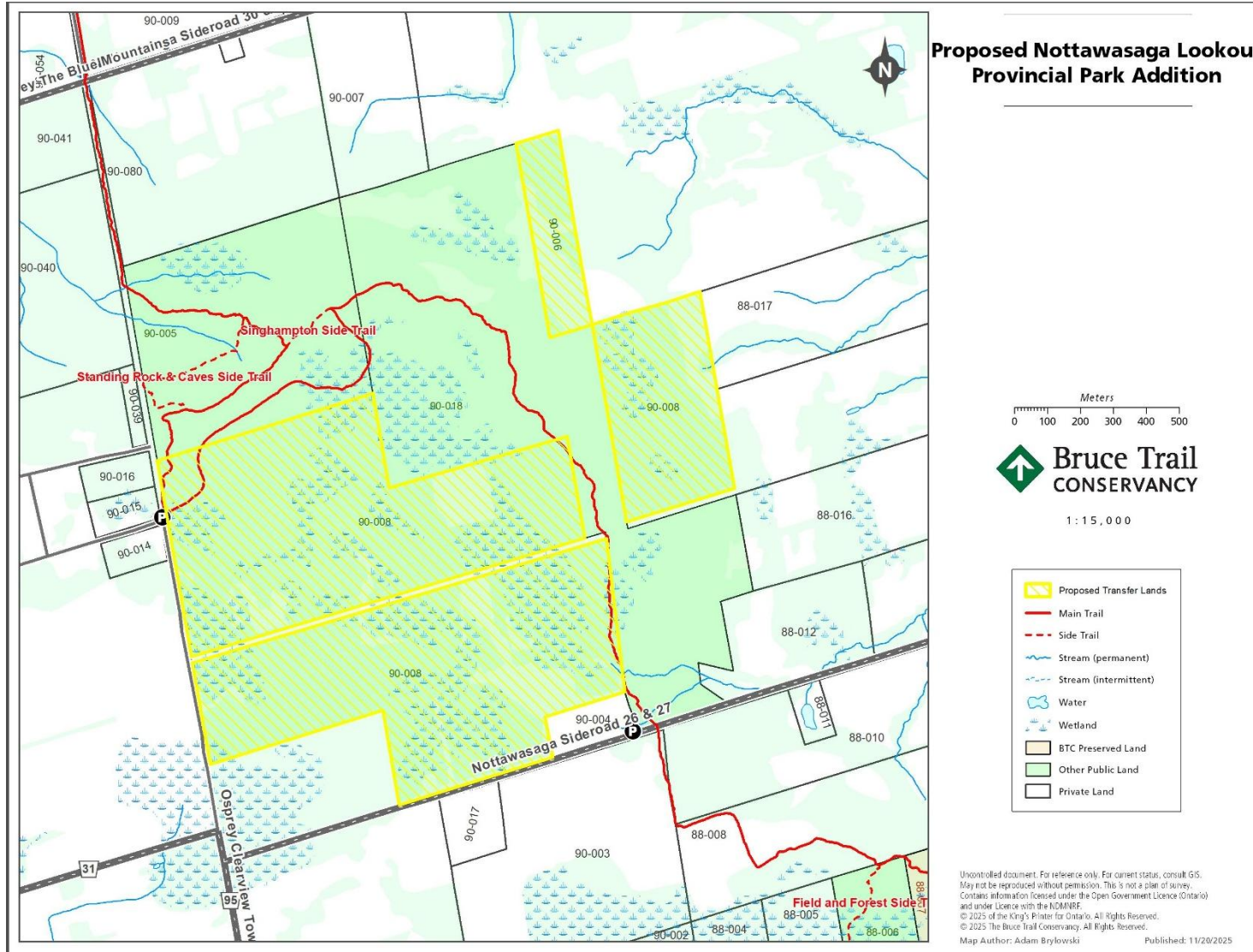
## 31. Boyne Valley Provincial Park Addition



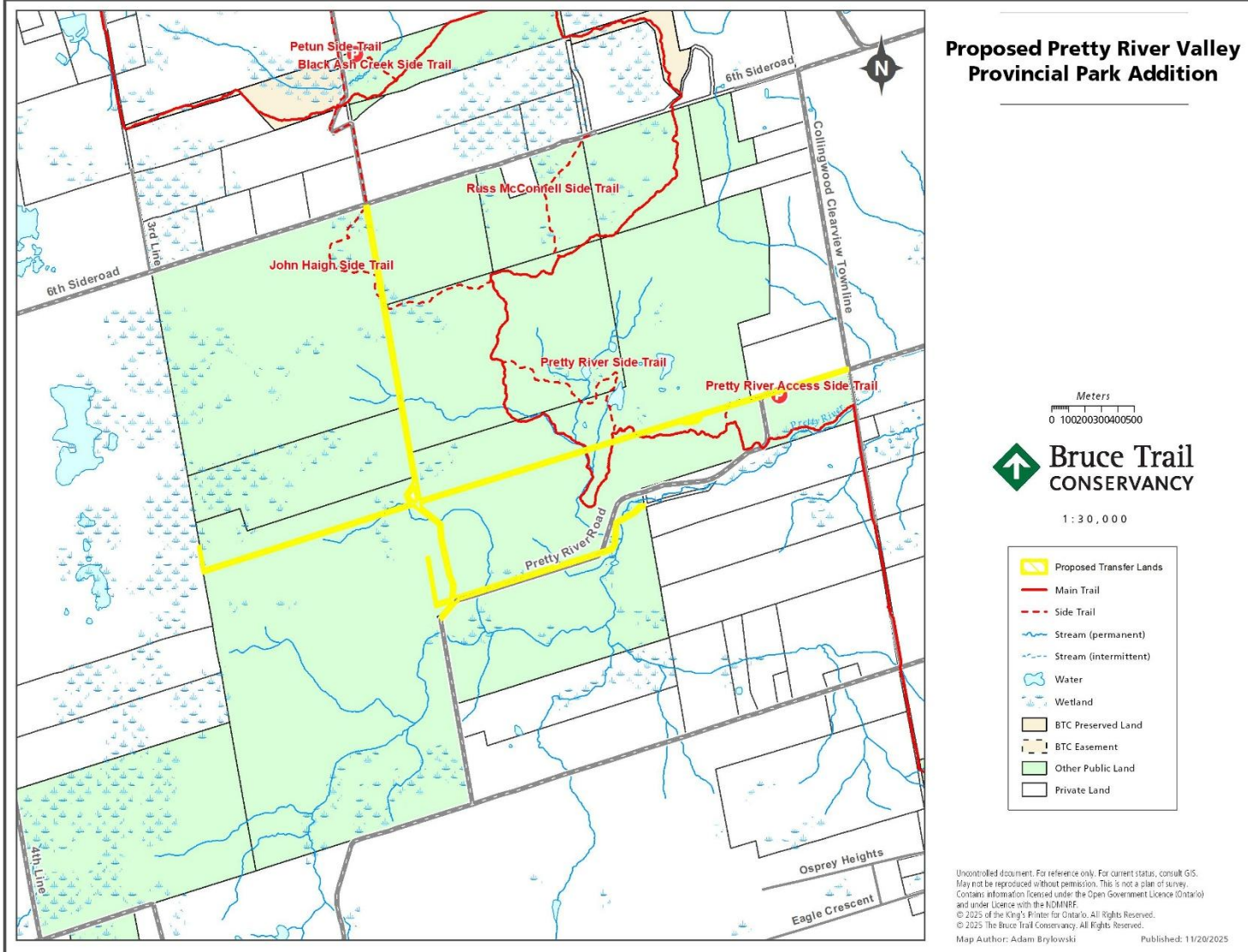
## 32. Duncan Escarpment Provincial Park Addition



### 34. Nottawasaga Lookout Provincial Park Addition

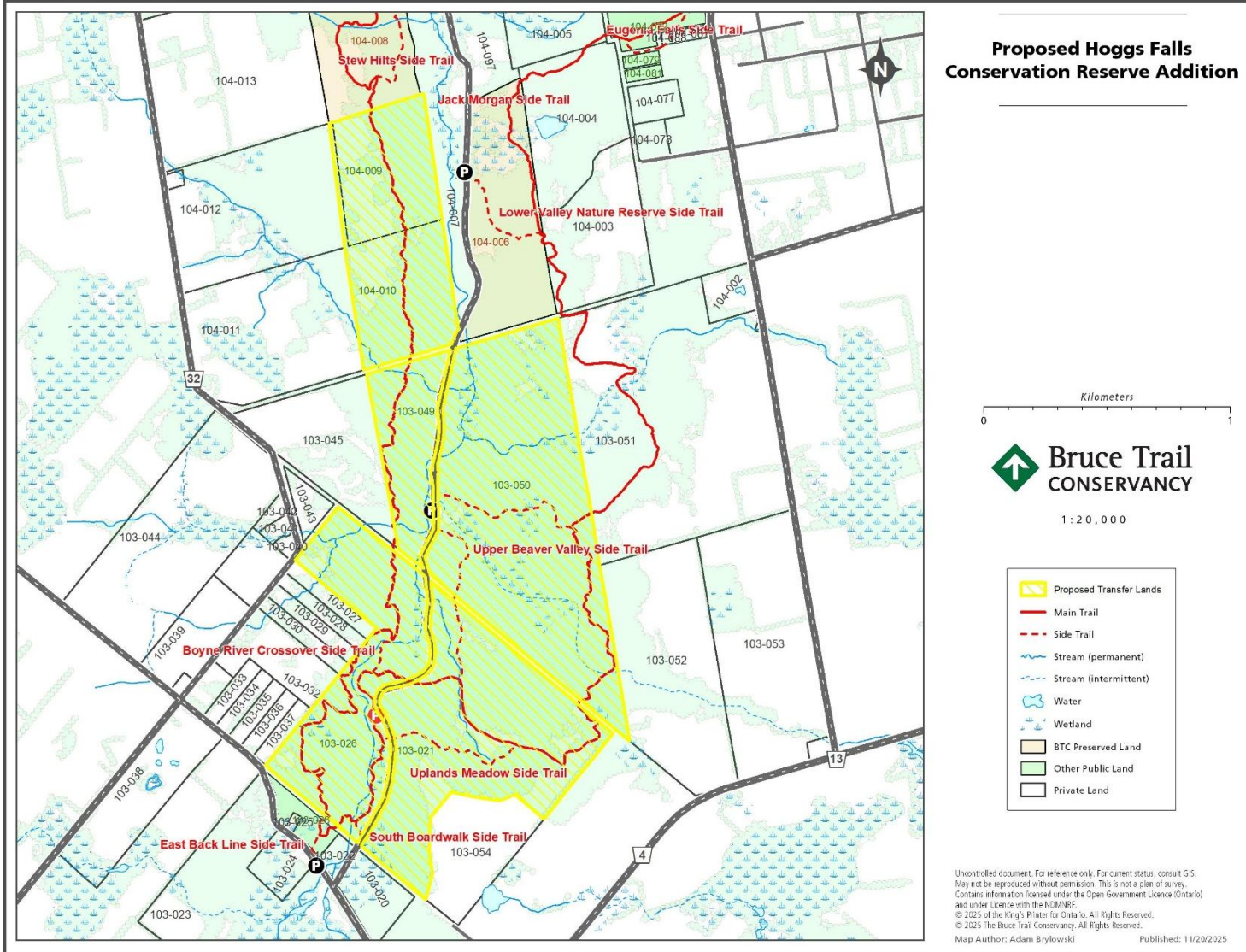


### 35. Pretty River Provincial Park Addition

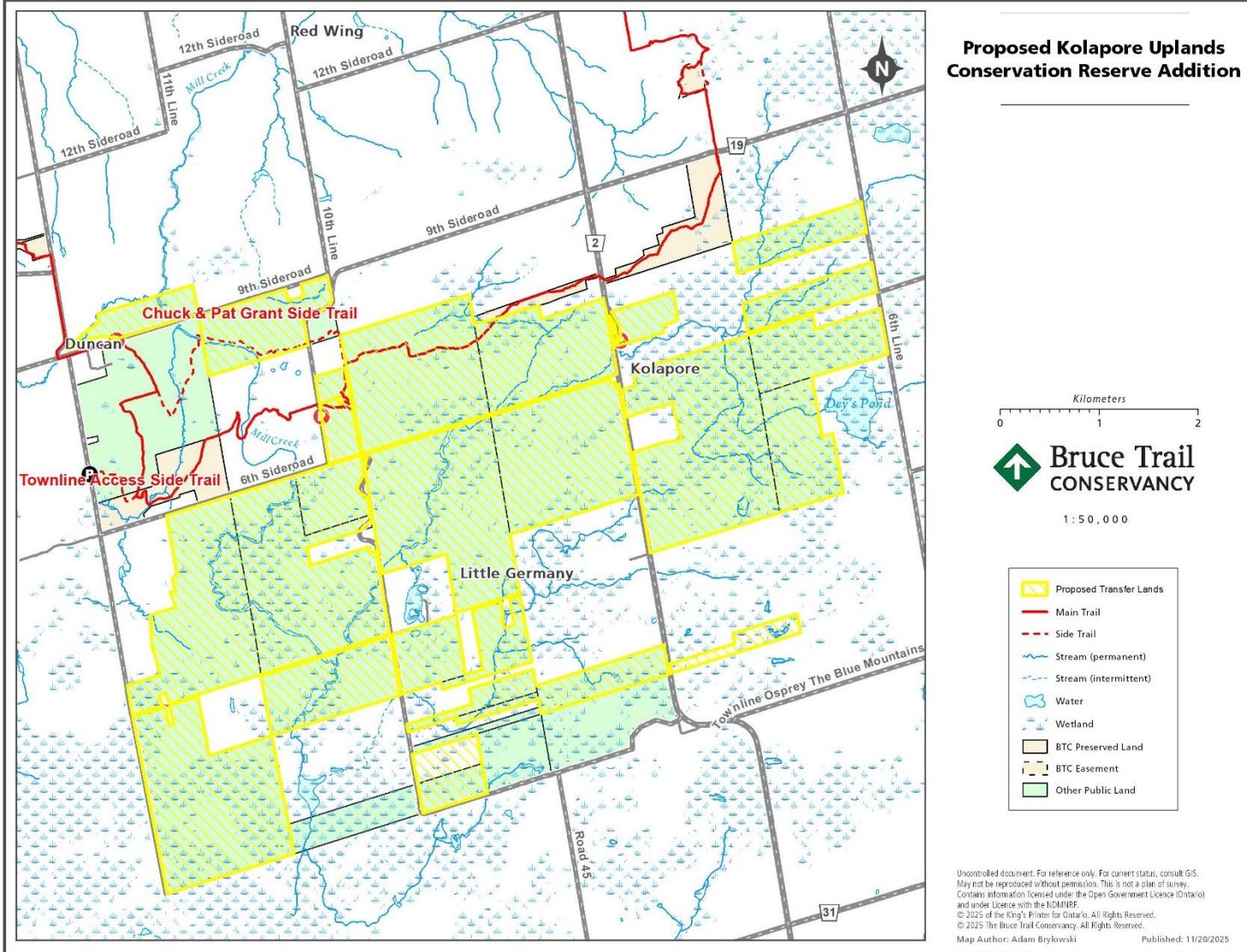




# 40. Hoggs Falls Conservation Reserve



# 41. Kolapore Uplands Conservation Reserve



## 42. Len Gertler Conservation Reserve

