



January 24, 2025

Ontario Parks
Southeast Zone, Ontario Parks Operations Division
300 Water St., 4th Floor North
Peterborough, ON
K9J 3C7

Attention: Ms. Kendra Couling, Park Planner
planning.sez@ontario.ca

Dear Ms. Couling,

RE: ERO 019-9209 – Uxbridge Urban Provincial Park Preliminary Management Plan 2024

Thank you for the opportunity to provide feedback on the proposed Uxbridge Urban Provincial Park (UUPP, the Park) Preliminary Management Plan. The Ontario Farmland Trust (OFT) has played an active stakeholder role in previous provincial land use planning policy reviews and is pleased to continue working with the Province to refine and enhance proposed policies in Ontario with respect to agriculture and conservation.

Celebrating its 21st year, the OFT is a not-for-profit organization whose mission is to protect and preserve Ontario farmlands and associated agricultural, natural, and cultural landscapes. Ontario's prime agricultural land is a finite, non-renewable resource that comprises less than 5% of Ontario's land base. With the growing rate of farmland loss in the province, currently at a rate of 129 hectares (319 acres) per day, it is more important than ever before that the Province protects our prime agricultural areas and provides opportunities to educate the public about the importance and fragility of our agricultural resource. Ontario's farmland directly supports the agri-food sector, which is the largest economic sector in the province, employing more than 871,000 Ontarians along the supply chain and annually contributing over \$50 billion to the province's GDP. OFT protects farmland through direct land securement, stewardship, policy research and education to ensure a safe and sustainable agri-food sector for future generations.

Proposal

The Ministry of the Environment, Conservation and Parks has prepared a preliminary management plan (the plan) for the UUPP, a park established in 2024 and containing 532 hectares (1,315 acres) within multiple separate parcels of land. These lands are located within the Gunshot Treaty (Johnson-Butler Purchase, 1787-1788), Williams Treaties (1923) and the Township of Uxbridge. Ontario Parks and other planning partners are also working to identify other priority land parcels for potential acquisition, through donation, land transfer or purchase, within the boundary of the current parcels. According to

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the plan, as currently written, its' purpose is to outline proposed site-specific management policies for the park to guide the park's long-term protection, development and management. The purpose of the UUPP is to have a role in creating ecological and recreational connections across the Oak Ridges Moraine based on ecological and/or recreation benefit to the park.

The values of the plan are based on Natural Heritage (life and earth sciences), Cultural Heritage (Indigenous and settler cultural heritage) and Ecologically sustainable recreation. To this end, the draft policy direction for the protection, development and management of the park includes: 1) a guiding vision and objectives; 2) zoning policies; 3) resource management policies; 4) recreation management policies; and, 5) operation and development policies. Furthermore, a summary of pressures on the park values are identified from motorized vehicles, trail use, boundary encroachment, unauthorized activities, invasive species, resource extraction, impacts from adjacent uses including aggregates and utility corridor adjacent to the park, historical settler land use, dumping, habitat fragmentation, wildlife, poaching and climate change.

Comments

Generally, as a premise of its own approach, the OFT would support the opportunity for the Province's securement of lands as Provincial parks for the purposes of long-term protection and enhancement of the land permanently as a public good. This provides support for natural heritage and ecosystems, reconciliation with the Indigenous Communities and for the health and well-being through nature appreciation and recreation. The challenge is the preliminary management plan, as currently written, appears as a document of guidelines without specific policy details to frame its land uses, resources and operations. Significantly, the UUPP contains 186 ha (459 acres) of land which currently contains agricultural uses including maple sap production in a mature forest, though there is no inclusion of the ongoing agricultural uses or the consideration of continuing these uses or changing to another agricultural use as a way of protecting and educating the public who will be using the park.

For lands under lease agreement, there is no information on how long these leases are in place; only that once the lease agreements are up these lands will no longer be used as they are currently. OFT recommends that the plan be expanded upon by considering other federal and provincial urban or near-urban park frameworks with a similar mix of land uses (e.g. Rouge National Urban Park and Bronte Creek Provincial Park) where agriculture is included as a significant and ongoing land use.

Section 6 of the plan makes reference to Zoning, which readers may confuse with municipal zoning. Though the rationale may be similar, about how land and buildings may be used within a specific area or zone, it is suggested that 'land use areas' or another more suitable term may be more appropriate.

The lack of details provided in the plan are most concerning. For example, it is vital to acknowledge and understand the value of the agricultural soils found within the UUPP properties. Whether the soils are classified under the high-quality soils found in the Canada Land Inventory (CLI) (e.g., Class 1, 2 and 3) or



other classes of soils (e.g., Class 4+), they all can support agricultural activities. Understanding the quality of the soils helps guide the type of crops grown or the level of productive farming based on proper management practices. A plan with information gaps undermines these lands' potential contributions, whether for the length of the lease agreement or longer-term. This makes the land vulnerable to negative impacts including the loss of agricultural uses. Enhancing the clarity, accountability, transparency, and enforceability of the statements within the plan will ensure these lands play an important role in supporting the ongoing protection and viability of Ontario's agricultural land base, alongside the park's focus on conserving natural heritage and protecting against the pressures of incompatible or impactful land uses.

Specific aspects of the plan that raise concerns for the impact to agricultural lands and associated natural and cultural landscapes are highlighted in the comments below:

- 1.4 Ecological integrity** – stronger more supportive language should be used for restoration rather than the current phrase 'shall be considered'.
- 2 Classification** – this section states the UUPP is a recreational class park then notes a new classification of park was being proposed without identifying the possible change which would happen through a regulation amendment. Additional information should be provided on the new classification and the reason for the change.
- 3.1 Purpose** - the purpose is focused on connectivity, however, without high quality working features and functions there are no systems to connect. This section should be expanded to provide recognition to the past, current and possible continuing agricultural uses on the properties.
- 3.2 Vision** - add an opportunity for economic development through diverse land use including agricultural.
- 3.3 Objectives** - additional details on what has been identified or is contained within these properties should be provided to help guide protection and enhancement. There is a need to also recognize the importance of restoration. Without a resilient feature there is no use trying to connect it if it is unable to handle the impacts of recreational use.
Recreation - the language can be improved by inclusion of a statement on how to manage any impacts from such uses. As an example, staff may wish to review Conservation Halton's approach and policies for mountain bike use in the Kelso Conservation Area/Glen Eden ski hill.
- 4/6 Values/Zoning** - These sections highlight the proposed values and identify areas of land uses. Although descriptive, there is a lack of detail and understanding of how these values and land use areas will be protected, maintained and enhanced. Not until the Implementation priorities is there mention of a Resource Management Strategy. There should be a section to identify the need for and purpose of further planning. This will then provide a better connection to the priorities list for further assessments, strategies and implementation plans with input from partners and the public. See note under **8 - Implementation priorities**.



- 7 **Policies** - The policies for industrial should include commercial activities, such as existing and future agricultural uses. A list of permitted activities and an expanded list of prohibited activities should be included with the requisite policies for appropriate land management.
- 8 **Implementation priorities** - Under the applicable legislation add reference to 'Treaties, lease agreements, Provincial Policy Statement 2024' etc. Note there is a misspell in the title of the table 'Actions identified in management the plan'. A better connection to the priorities with respect to a Resource Management Strategy, should be identified in the plan. This could include a separate section earlier in the plan which identifies how assessments will be identified and undertaken through more detailed directions based on a Resource Management Strategy (and possibly a Recreation Management Strategy) and implementation plans. Under the list of long-term priorities include 'Ongoing maintenance and enhancement of land use areas to ensure protection of high-quality features and functions.'

Recommendations

OFT recommends the following items be considered and appropriately implemented through a revision to the UUPP. The revised plan should be made available for review and feedback, prior to any final decision on the matter:

1. Provision of an additional level of detail, including definitions, wherever possible, during this preliminary management planning stage with respect to the resources or more appropriately the features and functions within and adjacent to the UUPP along with incremental timeframes for the work (e.g. 2 years, 5 years, 10 years). For example, having knowledge of the class of agricultural soils (via mapping or Ontario Ministry of Agriculture, Food and Agri-business staff) or the level of degradation of the soils and other systems which support the agricultural system can provide further guidance on how the lands are to be used, managed and restored. Similarly, such available information should be included in other pertinent sections (e.g. tree canopy and species assessments, species information etc.) as additional guiding documentation for the policies.
2. Inclusion of statements supporting the agricultural system planning framework as implemented by the Provincial Policy Statement 2024 (PPS 2024). As a Provincial Park with current agricultural land uses, the adoption of an agricultural system approach is an essential step in ensuring the preservation and enhancement of a geographically continuous agricultural land base. Supporting this systemic approach both in policy and operational use is fundamental to maintaining the viability and sustainability of Ontario's agriculture. Similarly, the policies of the PPS 2024 should be recognized for the purposes of protecting and enhancing the other associated natural and cultural heritage.
3. The Commercial Use Natural Environment Zone (NE2), comprised of mature forest used for maple sap harvesting and agricultural fields under lease to commercial operators, should be continued as an Agricultural Use (A1 or A2 depending on soil quality). Working with the



agricultural community appropriate uses to permit for compatible, near-urban agricultural uses (e.g., current uses, other new market crops like ethnic foods, nutraceuticals, and pharmaceuticals ; or, community gardens etc.) should be identified. The Toronto Region Conservation Authority plans with respect to agricultural uses on their properties are a good example. Protecting the agricultural land use allows for the existing or a new agricultural use to contribute to urban food systems and social enterprises and offer education opportunities, while protecting species at risk and maintenance of ecological integrity.

4. Whether the lands remain in agricultural use or new agricultural lands are added to this park plan, detailed operational guidelines/policies should be developed in consultation with farmers to best support agricultural uses while protecting the natural heritage and water system (e.g. late-cut hay to support Bobolinks, appropriate management methods re: conservation tillage, nutrient and energy management identifying ways for carbon sequestration and protect water systems etc.).
5. Working with the Province, municipalities, not-for-profits, corporate and private landowners, create an opportunity for an expanded linked network of trails (Oak Ridges Moraine, Trans Canada, Bruce, Ganaraska , Waterfront Trail etc.), Provincial parks, conservation areas, and possibly private lands along the Oak Ridges Moraine, Niagara Escarpment and beyond. Such a network will help to protect the land system supporting vital agricultural and ecological areas, whether secured through outright ownership or conservation easement, while offering educational, recreational and economic opportunities.
6. Expand upon the opportunities for signage and on-site programming for education and research on the land uses (e.g., agricultural uses, maple syrup production, erosion or soil loss, conservation tillage or other management approaches – grassed waterways, riverbank restoration) and methods to reduce impacts whether from climate change, from misuse or overuse (e.g., adaptation, mitigation, etc.)
7. Ensure that incompatible uses that may impact neighbouring agricultural areas must demonstrate that all alternative locations have been evaluated to avoid prime agricultural land, and where unavoidable, that there is minimal impact on agricultural operations (e.g., trespass etc.). Impacts should be assessed as they are vital in acknowledging and protecting agricultural uses and ensuring the continuation of normal farm practices.
8. Identify opportunities to increase compatibility between the agricultural and non-agricultural uses by prioritizing avoidance, minimization, and mitigation of adverse impacts on agricultural operations. It is crucial that the broader agricultural system be considered along with any direct impacts on the current agricultural operations and lands. This focus will ensure a comprehensive understanding of potential impacts and more effective mitigation strategies while continuing to allow for the recreational and other uses. The use of educational signage or programming would be advantageous.



9. Consideration of release of a second draft of the UUPP Preliminary Management Plan for public consultation, prior to a final management plan being released, given this additional detailed feedback following this posting.

The Province can ensure that the clarity, accountability, transparency and enforceability of the UUPP preliminary management plan and its policies, will implement its commitment to protect its agricultural lands, from the pressures of incompatible land uses. The aim of these recommendations is to maintain the viability of agriculture within the UUPP, and support the broader agricultural systems to which the UUPP lands are linked. This helps to ensure the sustainability of our agricultural resources and support Grow Local initiatives and improve food security for current and future residents. Through these clarifications, the UUPP and its proposed uses should allow for the continuation of existing agricultural activities, prevent unnecessary removal or impacts on natural features and provide opportunities for restoration while remaining sensitive to the rural landscape and community needs.

Summary

With the adoption of these recommendations, the UUPP can better safeguard Ontario's natural heritage and its rural and agricultural lands from inappropriate or unintended uses ensuring that these areas contribute positively to Ontario's environmental, economic, and social infrastructure. Maintaining the integrity of agricultural and rural lands is important for biodiversity and ecological health but also for the cultural heritage and rural economy of Ontario.

Clarifying the guidelines in the preliminary park plan could contribute to protecting Ontario's agricultural land base from unsustainable urban sprawl and ensuring that growth is managed in a responsible and strategic manner. This approach not only preserves our valuable farmlands but also promotes efficient use of existing urban infrastructure, enhancing the sustainability and livability of Ontario's communities.

Thank you for considering our submission. The OFT looks forward to the Province's response and to working together to safeguard our limited and non-renewable agricultural resources and natural and cultural landscapes. OFT hopes there will be another opportunity for further input prior to release of the final plan.

Sincerely,

Martin Straathof
Executive Director Ontario Farmland Trust

cc: Margaret Walton, Chair of the Board of Directors, Ontario Farmland Trust

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