



May 21, 2024

Standing Senate Committee on Energy, the Environment and Natural Resources
 The Senate of Canada
 Ottawa, Ontario
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 EMAIL: enev@sen.parl.gc.ca

Honourable Members of the Senate Standing Committee on Energy, the Environment and Natural Resources,

Re: Bill C-248 (An Act to amend the Canada National Parks Act (Ojibway National Urban Park of Canada))

On behalf of The Friends of Ojibway Prairie, Citizens Environment Alliance of Southwestern Ontario, Public Advisory Council - Detroit River Canadian Cleanup, Essex County Field Naturalists' Club, Little River Enhancement Group Essex-Windsor, Nature Canada, Ontario Nature, Unifor Windsor Regional Environment Council, Unifor Local 444 Environment Committee and Wildlife Preservation Canada we present to the Standing Committee on Energy, the Environment and Natural Resources our submission on Bill C-248, An Act to amend the Canada National Parks Act (Ojibway National Urban Park of Canada).

Ojibway Prairie Complex and Protecting Urban Natural Areas

The Ojibway Prairie Complex is truly a gem of natural heritage featuring an incredible variety of species found in such a small urban space – no natural area in Ontario has such a concentration of rare species. Those who visit Ojibway are in awe at what can be found in a place surrounded by human impact with the River Rouge heavy industrial area just across the Detroit River to the west, the new Gordie Howe

International Bridge directly adjacent to the north and Ontario's 401 highway located near the eastern boundary of the complex. The lands of the Ojibway Prairie Complex have been acquired and maintained over many decades thanks to the admirable work of the City of Windsor, the Province of Ontario, Nature Conservancy of Canada and now the federal government. Since 2012, the Windsor-Essex community has been calling for the Ojibway Prairie Complex to be enshrined in legislation under the stewardship of Parks Canada. It is with good reason that Ojibway is the consensus location for Canada's second national urban park.

As confirmed through testimony to date regarding Bill C-248 and past testimony heard during the recent study of Bill S-14, enshrining a park in strong legislation is the critical step to ensuring that Parks Canada has the tools available to protect an Ojibway National Urban Park for current and future generations. We know that designating a park based on policy alone will not provide the same certainty of protection as jurisdiction for most lands would remain with the municipality without providing the resources and tools that a legislated national park brings. Further, a park created through policy is not granted the same permanence that exists for one enshrined in the Canada National Parks Act.

Urgency for Legislation

Urban natural areas face human-related stresses at a higher level than traditional wilderness parks. This is occurring at an accelerated rate as the pressures of Canada's housing shortage bump up squarely against the need to protect biodiversity and natural areas. Windsor-Essex is not immune to this reality as has been experienced in recent months with federal funding from the Canada Mortgage and Housing Corporation being tied to municipalities loosening requirements for community engagement prior to housing development taking place. Noteworthy private lands in the South Cameron Woodlot within the Parks Canada study area have already been cleared for development since the national urban park project began. The City of Windsor has also faced pressure from the federal government to adjust its official plan to accommodate the potential for high density housing developments in areas directly neighbouring the existing Ojibway Prairie Complex that could otherwise serve as valuable lands for buffers, ecological corridors or restoration. With the unique pressures that urban parks face, it is critical that there be consolidated ownership of lands with the tools of strong legislation to allow Parks Canada to act on behalf of the need to protect and restore the ecological integrity of the Ojibway Prairie Complex. If we wait several years to determine what kind of protections the Ojibway National Urban Park will have, significant opportunities to protect this unique area of biodiversity will be lost. Residential and commercial development projects are ongoing in the area and we must encourage efforts to be equally swift in ensuring we are protecting our natural heritage.

Collaborative Solution

We continue to urge all parties and partners to work together toward a collaborative solution that has community best interests in mind. While Parks Canada's policy document has not yet been released, our understanding is that there will be room for the inclusion of legislated lands within the policy framework. A solution that leverages the flexibility of Parks Canada's policy approach to consider additional lands outside the Ojibway Prairie Complex while enshrining the core Ojibway lands in the Canada National Parks Act would seem to be an optimal solution. Necessary consultation and engagement with partners and stakeholders can continue as one cohesive initiative. We do not feel there needs to be two separate and competing processes at this juncture, just all sides working together and consulting with one another to deliver an Ojibway National Urban Park that Windsor-Essex and all of Canada can be proud of.

Clarification of Mapping : Parks Canada Study Area

We are concerned that at this late stage in the process that a competitive approach to mapping is still going on rather than working collaboratively to identify for the committee precisely where problems may exist with the C-248 coordinates and provide helpful recommendations for how amendments can be considered.

Comparing the Parks Canada Study Area map directly with the Bill C-248 mapping as has been presented to the committee can cause confusion. Bill C-248 is proposed as a near final mapping of public lands that has taken great effort to avoid inclusion of private lands in order to be appropriate for addition to the Canada National Parks Act. The Bill C-248 coordinates are focused on the core lands of the Ojibway Prairie Complex which are well established natural areas that the Windsor-Essex community has been advocating to be enshrined in legislation as a national urban park since 2012.

The Parks Canada study area is an exploratory map that includes 813 private parcels that make up 137 hectares of private land in the City of Windsor portion of the study area ([Windsor NUP Open House slide 18](#) - The Town of LaSalle is unable to provide exact numbers at this time). None of the lands on the Parks Canada study map have been confirmed to date as being included in an established national urban park. While we greatly appreciate the Windsor National Urban Park team undergoing this important aspirational exercise in identifying potential lands for consideration, using this map in direct comparison with the Bill C-248 map in the context of a committee study risks it being a misleading exercise. A better approach would be to use Bill C-248's mapping as a starting point for legislation while leveraging the draft study area map to consider how the park might be expanded through policy at establishment or have new lands added to legislation in the future. For the committee's information, we have included a land administration map that was produced by the Windsor National Urban Park project team that helps show which parcels on the Parks Canada study map are privately owned and why some of these lands have not been included in the Bill C-248 coordinates (Figure 1).

Clarification of Mapping : Ojibway Prairie Provincial Nature Reserve

In reviewing written submissions to the committee, we note some confusion regarding the Ojibway Prairie Provincial Nature Reserve. To our understanding, this confusion exists because the regulated lands of the Provincial Nature Reserve encompass approximately 64 hectares of land in an inverted "L" shape. These are the lands that officially comprise the Nature Reserve and are included in the Provincial Parks and Conservation Reserves Act. These lands are also, to our understanding, included in Bill C-248.

There are adjacent lands to the southeast of the Nature Reserve that are comprised of provincial land, private land and unopened road allowances ([Ojibway Prairie Management Plan](#)). These lands are not part of the regulated boundaries of the Ojibway Prairie Provincial Nature Reserve and are not included in Bill C-248.

Consolidating and regulating lands directly adjacent to the Ojibway Prairie Provincial Nature Reserve has been an ongoing interest that the Windsor-Essex community has been advocating for with the Ministry of Environment, Conservation and Parks. Adding these lands to the Ojibway National Urban Park at a future date would be of great interest.

Figure 2 below is from the [Ontario Parks Management Plan of the Ojibway Prairie Provincial Nature Reserve](#) and shows the current regulated boundary as well as the proposed expanded boundary to include the southeast lands at a future date.

Potential Amendments

Should Bill C-248 be found to contain private lands, we recommend that the bill be amended to remove coordinates associated inadvertently included private lands.

We also encourage continued collaboration between all parties to establish this vital national urban park and continue to explore expansion opportunities post-establishment. We would be supportive in principle of any amendments that help to consolidate the processes and leverage the benefits of both Bill C-248 as well as the efforts Parks Canada is undertaking to engage with partners and stakeholders.

Mike Fisher, Interim President, [The Friends of Ojibway Prairie](#) (Appearing May 23, 2024)

Derek Coronado, Coordinator, [Citizens Environment Alliance of Southwestern Ontario](#)

Tom Henderson, Chair, [Public Advisory Council, Detroit River Canadian Cleanup](#)

Jennifer Nantais, Director, [Essex County Field Naturalists' Club](#)

Ian Naisbitt, Chair, Little River Enhancement Group Essex-Windsor

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Tony Morris, Conservation Policy and Campaigns Director, [Ontario Nature](#)

Richard St. Denis, Chairperson, [Unifor Windsor Regional Environment Council](#)

Rick LaBonté, Chairperson, [Unifor Local 444 Environment Committee](#)

Jonathan Choquette, PhD, Lead Biologist, [Wildlife Preservation Canada](#)

Figure 1: Parks Canada Draft Study Area Map (Public vs Non-Public) [Created by Windsor NUP Project](#)

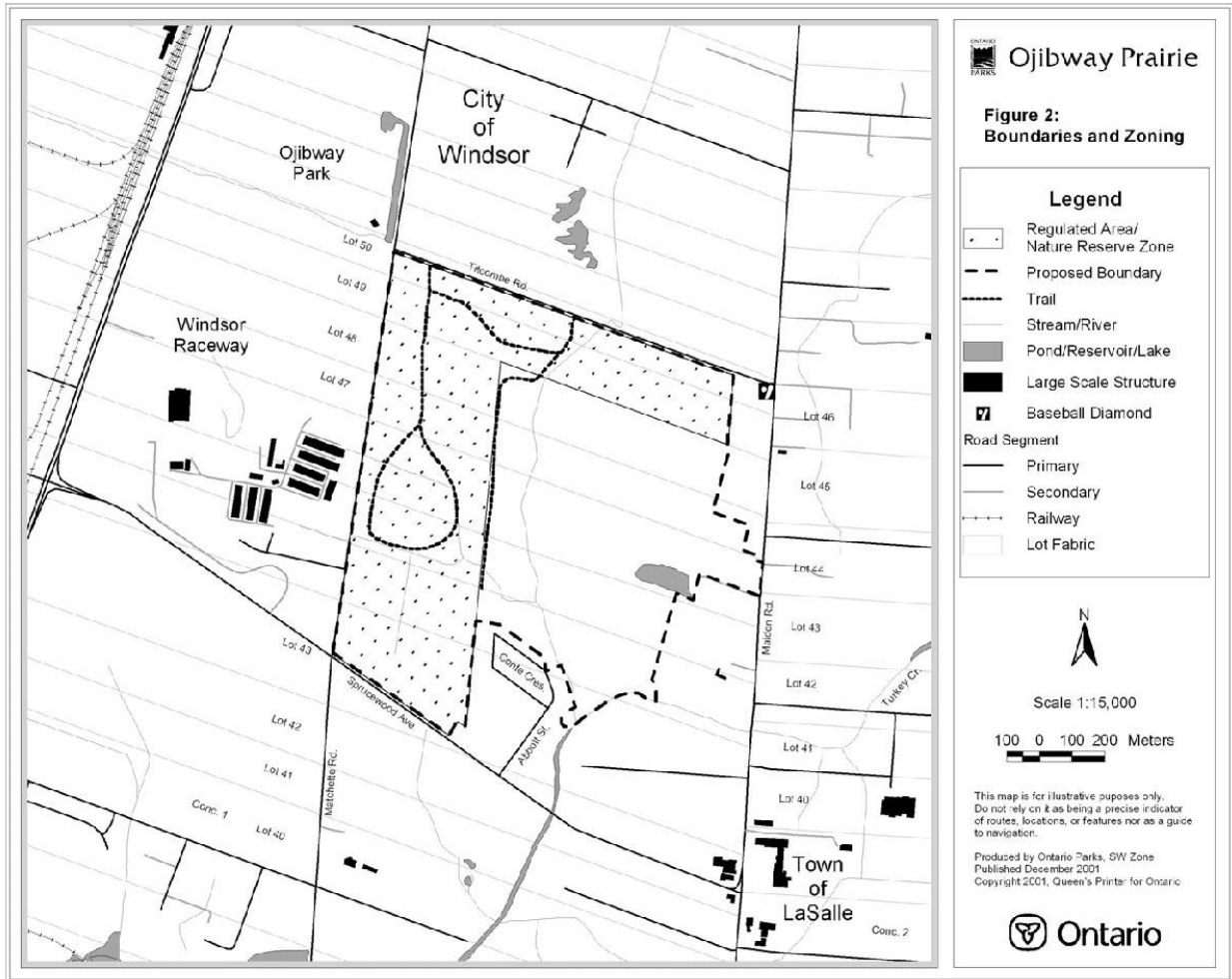
Land Administration Map



Land administration of each parcel has been documented to better understand the composition of the areas, lands for consideration, and potential boundaries. Administration of additional study area lands, as they are added, will be assessed.

Consultation with land administrators will occur prior to inclusion of lands within the final area of the national urban park. **Lands will only be added to the final area of the national urban park with clear and express consent of existing land administrators.**

Figure 2 : Ojibway Prairie Nature Reserve Map from [Ontario Parks Management Plan](#)



Ojibway Prairie

**Figure 2:
Boundaries and Zoning**

Legend

- Regulated Area/
Nature Reserve Zone
- Proposed Boundary
- Trail
- Stream/River
- Pond/Reservoir/Lake
- Large Scale Structure
- Baseball Diamond

Road Segment

- Primary
- Secondary
- Railway
- Lot Fabric



Scale 1:15,000

100 0 100 200 Meters

This map is for illustrative purposes only. Do not rely on it as being a precise indicator of routes, locations, or features nor as a guide to navigation.

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