



Brief for the ENVI Committee Regarding the Study of Bill C-248 (An Act to amend the Canada National Parks Act (Ojibway National Urban Park of Canada))

The Friends of Ojibway Prairie, Essex County Field Naturalists' Club, Wildlife Preservation Canada, and the Citizens Environment Alliance thank the ENVI Committee for their time in studying Bill C-248. We are very eager to see such crucial natural areas in Windsor-Essex connected as an Ojibway National Urban Park – no other site in Ontario supports such a high concentration of rare species. Despite the pressures of urban development, the Ojibway Prairie Complex contains an extraordinary amount of biodiversity that rivals any location in Canada. The first ever 24-hour BioBlitz of the site was hosted by the Essex County Field Naturalists' Club and found over 1,120 species of flora and fauna, including 12 species never-before recorded in Canada. The Ojibway Prairie Complex and surrounding area is truly a precious gem well worthy of the highest levels of protection.

We are pleased to note that there has thus far been unanimous support in parliament for the creation of Ojibway National Urban Park, with disagreement being focused on the appropriate path to get there. In preparing this brief, considerable time has been spent engaging with experts, rightsholders in their traditional territory and stakeholders as well as reviewing relevant parliamentary discussion and existing legislation and studies. Understanding that Bill C-248 itself is relatively simple in its approach to add the identified lands to the Canada National Parks Act, we have focused on four areas of comment that may be helpful in guiding discussion and consideration of amendments during the study. We feel these areas of comment are crucial to the path forward in creating an Ojibway National Urban Park.

1) Legislation that makes ecological integrity the top priority

We are supportive of a solution that provides legislation that meets or exceeds the standard set by the Canada National Parks Act and the Rouge National Urban Park Act. We acknowledge past study and debate of Bill C-40 and Bill C-18 to enact and then amend the Rouge National Urban Park Act to ensure ecological integrity as the top priority for Rouge National Urban Park. It is critical that the proposed Ojibway National Urban Park and other future national urban parks be provided the same level of protection for critical ecosystems. While meeting this high standard for ecological integrity that Canada is renowned for worldwide may at times prove more challenging in urban areas, it is

precisely why doing so is of such importance. We must ensure that all parks under federal purview have the legislation and resources necessary to protect essential habitat for the maintenance of healthy plant and wildlife populations, and for the benefit of future generations of Canadians.

In reviewing the natural areas that would be included in an Ojibway National Urban Park, it should be noted that the Ojibway Prairie Provincial Nature Reserve lands are currently included in Ontario's Provincial Parks and Conservation Reserves Act and it would be an undesirable outcome for the lands to be transferred to the federal government without doing so under strong federal legislation as outlined above.

Bill C-248: We acknowledge that the currently studied Bill C-248 meets this requirement by adding identified Ojibway Prairie Complex and Ojibway Shores lands to Schedule 1 of the Canada National Parks Act.

2) Maximizing the park boundaries for increased ecological preservation and habitat

We are supportive of a solution that maximizes the size of an Ojibway National Urban Park. It is important that many adjacent properties be included to protect the surrounding ecosystems, connect the park for the movement of species through natural corridors and eco-passages and limit the development of lands that contain habitat that is ecologically significant. This includes lands already designated as "Critical Habitat" under the Species at Risk Act. It is vital that there is flexibility to add new lands to the park in the future.

Bill C-248: We would be in favour of amendments to Bill C-248 that increase the footprint of the proposed Ojibway National Urban Park by including logical adjacent lands to create connectivity and corridors that support species. For example, we note the Oakwood Natural Area is part of the Ojibway Prairie Complex and currently not included in Bill C-248. Also, the Herb Gray Parkway trail wisely includes an eco-passage over the 401 to physically link Oakwood with the rest of the Ojibway Prairie Complex. The park and the corridor would seem a logical addition to an Ojibway National Urban Park. We would be supportive of the consideration of similar lands within the proposed Ojibway National Urban Park study area currently being reviewed by Parks Canada, the City of Windsor, and the Town of LaSalle as well.

We would also be supportive of any amendments that may help clarify and expedite the process for adding future lands to the legislation schedule in the future.

3) Meaningful consultation and partnerships with Indigenous Communities

Any solution for an Ojibway National Urban Park should be developed through engagement with Indigenous communities as partners throughout the process. Advancing reconciliation with Indigenous peoples is important to the creation of a park that all can be proud of.

Bill C-248: We defer to our friends in Indigenous communities to express their perspective on the proposed legislation and consultation process.

4) Robust Community Consultation and Supporting Mechanisms

It is important that mechanisms for broad community consultation are clearly laid out as processes move forward and management plans are developed. An Ojibway National Urban Park has been a

dream of many in the local naturalist and conservation communities for decades and it is important to engage them for their expertise. For Ojibway National Urban Park to become the true gem that it can be, it is also crucial for wider engagement so that the entire community can share their pride in a park that is accessible for all to appreciate and is recognized across Canada.

Bill C-248: We would be favourable to any amendments that may help outline steps for appropriate community consultation in both the near term and on an ongoing basis.

We believe that the above four objectives are achievable and urge a collaborative approach to the creation of Ojibway National Urban Park where all parties and processes are working together to achieve an outcome that future generations can be proud of.

About The Friends of Ojibway Prairie

The Friends of Ojibway Prairie is a registered charity and volunteer organization dedicated to promoting public awareness of the Ojibway Prairie Complex and its unique biological, cultural and historical importance. The Friends work closely with the City of Windsor and Ontario Parks to provide assistance with educational programs, special events and restoration projects.

For more information: www.friendsofojibwayprairie.com; friendsfojibway@gmail.com

About The Essex County Field Naturalists' Club

The Essex County Field Naturalists' Club is a non-profit, open-to-the-public volunteer organization that focuses on promoting the conservation and restoration of the diverse natural heritage of Essex County and the surrounding region. We also strive to provide educational opportunities for the people of Essex County to become acquainted with and better understand the natural environment.

For more information: www.essexcountynature.com

About Wildlife Preservation Canada

Established in 1985, Wildlife Preservation Canada is a national charity devoted to saving endangered animal species facing imminent extinction in Canada – species whose numbers in the wild are so low that habitat protection alone is not enough. It is currently providing expert hands-on care to reptile, amphibian, bird, and insect species in projects ranging from the St. Lawrence/Great Lakes region to Vancouver Island, making it the only organization in Canada to perform such work in multiple species recovery efforts across the country.

For more information: www.wildlifepreservation.ca; Contact: 519-836-9314, admin@wildlifepreservation.ca

About The Citizens Environment Alliance

The Citizens Environment Alliance (CEA) is a non-profit, grass-roots, international, education and research organization. The CEA strives to protect, restore and enhance the quality of local ecosystems in the Detroit-St. Clair River corridors, the western basin of Lake Erie and in the Windsor-Essex, region of the Great Lakes basin.

For more information: www.citizensenvironmentalliance.org