

CPAWS-OV SUBMISSIONS ON KAWARTHA HIGHLANDS PROVINCIAL PARK MANAGEMENT PLAN

20 October 2007

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RE: EBR Registry Number: PB05E6008

RE: KAWARTHA HIGHLANDS SIGNATURE SITE MANAGEMENT OPTIONS

The Ottawa Valley Chapter of the Canadian Parks and Wilderness Society (CPAWS OV) has been involved in parks management plans and in the protection of natural areas for over 35 years. We represent 1650 members in the Ottawa valley, and beyond.

CPAWS OV is disappointed by this proposed master plan. While Ecological Integrity is featured both in Ontario's new Parks Act and in the legislation specific to the Kawartha Highlands Signature Site Provincial Park (KHSSPP) as the overriding consideration in Parks management, in the KHSSPP Ecological Integrity is nearly always trumped by almost any competing human use. The KHSSPP Management Plan (MP) tries to be all things to all people, and thus fails in many aspects. CPAWS OV believes that the primary purpose of parks must be to protect the natural ecosystems which they contain. Since parks represent such a small proportion of Ontario, full protection is completely proper. The problem with the KHSSPP MP is that, quite improperly, human usage is allowed to dominate the ecological integrity mandate.

For instance the worthy goal of "To preserve semi-wilderness characteristics" (Goal 1.1 p 12) is watered down to a much less worthy "To provide areas within the park that have a semi-wilderness character." Somehow the goal (Goal 2.1 p13) "To provide opportunities for diverse, low-intensity recreation . . ." has been corrupted to include "To provide local municipalities with social and economic benefits." One does not flow from the other. Goal 3.2 (p14) "To allow continued access to and enjoyment of private and tenured land" and goal 3.3 "To allow existing commercial activities to continue" are both incompatible with ecological integrity. Parks are not the places for commercial activities.

Ecological integrity is not compatible with the killing of wildlife. Yet this park will allow the killing of bear, moose, deer, small animals, fur bearing animals, bait fish and sport fish.

Several times the use of deadwood only for firewood is sanctioned by the KHSSPP MP. However, as CPAWS OV pointed out several times in previous input, deadwood serves a very useful ecological function, and is not expendable.

CPAWS OV supports the road access, The Beaver Lake Road on the west and the Anstruther Lake Road on the east, chosen in the Kawartha Highlands Signature Site Park Access Road Study (although the Draft Environmental Study Report arrived to late for thorough study). We note that, in the executive summary section, ecological integrity is not listed as the primary consideration around which other uses must fit.

In general a park which bends over backwards to include all manner of private and commercial camps and commercial resource extraction (except of course, the big three of forestry, mining and hydro) appears to be denying the possibility of and interest in ecological integrity.

CPAWS OV (p16) continues to oppose all forms of trapping, commercial bait-fish taking, and hunting, including bear hunting.

CPAWS OV (p16/17) opposes the transference of existing licences on activities which are contrary to ecological integrity.

CPAWS OV (p18) opposes any form of hydro transmission lines within the Park.

CPAWS OV (p20) opposes new commercial tourism opportunities.

CPAWS OV (p21) urges non-lethal methods of dealing with animal invasive species.

We specifically oppose culling as a management tool.

CPAWS OV (p21) opposes the stocking of fish, if this is what is meant by "existing populations replenished". New research has shown that stocked fish greatly reduce the population's ability to reproduce, on the whole.

RE: (p21) "Non-chemical and species-specific controls will be used whenever possible."

CPAWS OV opposes the attempt to control insect or disease "problems" with chemical or biological controls.

RE: (p24) the discouraging of herbicides, except for poison ivy. CPAWS OV opposes all use of herbicides at all times.

CPAWS OV (p24) opposes the "Appropriate methods of population control . . . " if they are lethal. We do not endorse any method of culling animal species.

RE: (p25) Enhancing fishing opportunities are not consistent with managing for ecological integrity. Neither, it has now been shown, does stocking increase the viability of native populations. The closure of lakes to fishing is a more appropriate management tool.

RE: (p37) CPAWS OV opposes roofed accommodation within parks, wether supported or not by a business plan. Business plans have nothing to do with ecological integrity.

SECTION 9 ZONING

RE: (p37) The lack of wilderness and nature reserve zones is a cop out; the Park deserves better than this.

Yours truly

5 September 2006

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IN GENERAL

CPAWS OV recognizes that creating a park in southern Ontario in a manner that pleases everyone is an impossible task. Nevertheless, the Kawartha Highlands Signature Site Park (KHSSP) management planning needs to change its direction in order to accomplish the primary purpose under the KHSSP Act.

The Act creating the KHSSP mandates that Ecological Integrity (EI) be the “overriding priority” in the management of the KHSSP. The act is fairly plain on what EI oriented management must do: “2(a) that the protection of the ecological integrity of the Kawartha Highlands Signature Site Park is recognized as the overriding priority in the management and administration of the Park, so as to preserve, protect and enhance the natural composition and abundance of native species, biological communities and ecological processes in the Park;”. Unfortunately the strong mandate given by this Act is confused in the plan by the various other conflicting but lesser, as they are not overriding, priorities. To begin, CPAWS OV takes issue with the statement on P5 of the Management Options document: “Consequently, management must strive to achieve the best possible balance between management for ecological integrity and allowing for human enjoyment of the park.” Since EI is of overriding importance, when questions or conflict arise between management for EI and allowing interfering activities, the decision must be made which favours EI.

Continuing in this vein, CPAWS OV opposes the tone of the Issues and Options document which makes many decisions which violate EI. There seems no limit on consumptive activity allowed by the Charter and reflected in the KHSSP Act. To name a

few: hunting, bear management areas, commercial bait fish taking, ATV and snow machine trails, trapping (even of species on the species at risk list!), new roads and power lines.

CPAWS OV does support the idea of adaptive management (P5) which can work where baseline data is adequate. In the case of KHSSP the required data has not been collected due to funding cuts; this means that the adequacy of adaptive management for KHSSP is at risk. CPAWS OV strongly recommends that funding for the collection of baseline information be restored. In addition, CPAWS OV stresses that, for adaptive management to work, several additional principles, perhaps unusual to park management, must be implemented. They are: the precautionary principle (if a proposal could cause harm, don't do it); the principle of reverse onus (the proponent of a proposal must prove that it is safe); the weight of evidence principle (absolute proof is not required); and the avoidance of incremental damage principle (many small things add up to big consequences).

CPAWS OV has taken part in many management plans over the years, and we have observed that it is virtually impossible to get significant changes once a draft plan is released. It is therefore very unsatisfactory that so many items, which are within the purview of a management plan, have not been considered in the Issues and Options (I & O) stage of the process. The I & O document itself lists 8 items for input and 10 items for which there are no options given.

Additionally, zoning, which is extremely important to any park, and which was brought up in our previous submission, is again not mentioned. We understand the quandary those running the management process must have over zoning; nevertheless some areas of the park need zoning protection. The Alvars come immediately to mind, as do the pockets of old growth forest, the various areas with thin to non-existent soil covering, the relict Atlantic biologic coastal communities and large areas to the north and south with minimal human intrusion.

CPAWS OV'S POSITION ON THE OPTIONS IDENTIFIED

ACCESS

1. Aircraft landing.

CPAWS OV supports option 4 which severely limits aircraft operations in the KHSSP

2. Motorboats.

CPAWS OV supports option 3, the most restrictive option. Additionally, we recommend a 10 horsepower limit on motors. (It should be noted that motorboats cause more than "a disturbance" to wildlife; loons for instance nest at the water's edge in places sheltered from wind generated waves but which boat generated waves reach. Thus the loon's ability to raise young is compromised by motorboats.)

3. ATV use for Hunting Purposes.

CPAWS OV opposes the use of ATVs in parks and wild places. CPAWS OV also opposes hunting within parks in southern areas of Canada where so much human

activity has compromised our native species, primarily through loss of habitat. These few wilderness areas must be retained for the health of all species. EI as the overriding management principle is violated by both hunting and the use of ATVs which therefore should be phased out of the KHSSP. Roads and trails fragment habitat while hunting deaths affects species composition, numbers and age distribution. If both these activities are forced upon the KHSSP, CPAWS OV recommends the most restrictive option, #3.

Further, CPAWS OV recommends that hunting be phased out of KHSSP on the basis that hunting interferes with Ecological Integrity. Natural species compositions, age cohorts and numbers cannot occur with hunting taking place. The KHSSP Act states that hunting within the Park is under the jurisdiction of the Fish and Wildlife Conservation Act 1977; the management of the KHSSP should actively lobby to get that act changed to eliminate hunting within the KHSSP..

According to the documentation, ATVs are supposed to stay only on recognized trails while hunting. We ask that a strict enforcement regime be put in place to ensure that they do not leave the trails before ATVs are permitted to take part in hunting activities.

RECREATIONAL USE

4. Backcountry Camping.

CPAWS OV supports option #3 with the following comments. 20 people per site is too many; CPAWS OV supports a maximum of 9. CPAWS OV strongly supports a can and bottle ban. CPAWS OV supports, for ecological and safety reasons, pit privies and fire pits.

5. Recreational activities.

CPAWS OV supports option #3 which would allow only the suite of low impact recreational activities.

RESOURCE USE

6. Fuelwood Permits.

CPAWS OV supports option #3, as the least damaging o the Park's EI. It must be noted that both standing deadwood and blowdowns have immense ecological value, and they should not be singled out for removal.

7. Commercial Tourism.

CPAWS OV supports option #3. Parks must protect the natural values contained within them. While grandfathered commercial uses are sometimes allowed, it is entirely inappropriate to allow new commercial uses.

CPAWS POSITION ON THE TOPICS BRIEFLY DISCUSSED FOR WHICH OPTIONS WERE NOT PRESENTED

8. Public Access

As a general principle, CPAWS OV strongly opposes new roads within parks. There are, however, options in this plan that we could support. On the east side an access point at the end of the Long Lake Road could be appropriate. In addition, access could be provided along the existing Anstruther Lake Road. Similarly on the west side, access

points should be located on existing roads. In each case, adequate parking facilities need to be provided.

9. Infrastructure and Service.

We note the concerns stated here. There should have been suggested solutions in the Issues and Options document. CPAWS OV will support ecologically based solutions to the many problems listed.

10. Visitor Management.

The KHSSP already has too many non-conforming activities and CPAWS OV strongly recommends reducing these rather than increasing or expanding them. CPAWS OV opposes new access. Since the KHSSP is only 10.5 kilometers wide at its middle point, it makes no sense to put a new road up to 2.5 kilometers into the Park.

11. Motorized Vehicle Road and Trail System

This park which more or less averages 19 x 19 kilometers square already contains 880 kilometers of ATV trails within its borders. CPAWS OV opposes any additional roads or trails.

12. Future Land Acquisition

CPAWS OV supports land acquisition to round out the Park to ecologically sensible boundaries. In particular, the Alvars to the south should be acquired before they are destroyed by quarrying.

13. Private Hydro or Phone Line Installations

CPAWS OV opposes land line installations within the Park.

14. Wildlife Management

CPAWS OV recommends that hunting be phased out of KHSSP on the basis that hunting interferes with Ecological Integrity. Natural species compositions, age cohorts and numbers cannot occur with hunting taking place. The KHSSP Act states that hunting within the Park is under the jurisdiction of the Fish and Wildlife Conservation Act 1977. In that case, the management of the KHSSP should actively lobby to get that act changed to eliminate hunting within the KHSSP..

15. Fisheries Management

CPAWS OV recommends that fish stocking not take place but that fishing should be managed to avoid over use. If stocking does occur, to protect the EI of KHSSP, we strongly oppose the stocking of non-native fish. CPAWS OV opposes all use of live bait fish. We understand that all use of live bait fish taken from waters other than those in which they are used is illegal, and so bait fish must not be allowed within KHSSP. The same rationale should make it illegal to take bait fish commercially; commercial baitfish taking must not be allowed within KHSSP, on the legal grounds as well as the EI grounds.

16. Vegetation Management

CPAWS OV recommends that the minimum possible management interference when natural disturbances take place. Blow downs, recognized here as important to natural processes, were previously recommended as places to obtain firewood. We oppose such activities.

17. Enhanced tenure

CPAWS OV supports the idea that EI comes before enhanced tenure.