

CPAWS-OV SUBMISSION ON TEMAGAMI AREA PARKS MANAGEMENT PLANNING

RE: TEMAGAMI AREA PROVINCIAL PARKS PRELIMINARY PARK MANAGEMENT PLAN

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RE: EBR Registry Number: PB04E2003

The Ottawa Valley Chapter of The Canadian Parks And Wilderness Society (CPAWS OV), has been actively involved in Parks Management issues for over 35 years. In this we represent our approximately 1650 members who are vitally concerned about parks and wilderness protection.

LADY EVELYN-SMOOTHWATER PROVINCIAL PARK

ZONING - THE WEAK POINT OF THE PRELIMINARY PLAN FOR LADY EVELYN-SMOOTHWATER PROVINCIAL PARK

CPAWS OV strongly opposes the non-conforming access zones proposed for Lady Evelyn-Smoothwater Provincial Park (LE-S). Not only do they ignore the definition given in Ontario's Approach to Wilderness: A Policy, May 1997 (Version 1.0)¹, but they also violate the ecological integrity of this undersized Wilderness Park.

LE-S has 2317ha of proposed access zones, which amount to 3.1% of this 72,400ha park. Contrast this immense total with that of the much bigger park, Algonquin, which is ten times larger, but which has only 735ha of access zone.² This large area devoted to access zones is contrary to the definition of access zones given on page 12 of the Preliminary Park Management Plan.³ It is also against policy as stated in the previous paragraph.

CPAWS OV objects to planning which violates the spirit and intent of Wilderness Parks or Wilderness zones by inserting illegitimate and flawed zones which provide lesser protection. It is plain that these access zones violate LE-S's wilderness class park standards. Bluntly put, they are there in order to allow non-conforming activities to occur in a Wilderness Class Park. The definition of a Wilderness Class Park is plain and simple; it prohibits mechanized travel. The planners are wrong in thinking that this kind of planning is acceptable.

CPAWS OV opposes seasonal zones which are a new and illegitimate concept.

CPAWS OV opposes the following improper access zones:

- A1 - 948 ha - essentially Smoothwater Lake and Montreal River to park boundary, established to allow motorboats and snowmobiles into a wilderness class park and zone.
- A1S - 36ha, about 15km along river corridor across park - "Seasonal" access zone to allow snowmobiles in a wilderness class park and zone.
- A2S - 131ha - to allow motorboats onto the North Branch of the LE river in a wilderness class park and zone.
- A3 - 65ha - 1km long - to allow snowmobile use, and summer walk in use - towards Tretheway Lake (walking is appropriate, mechanized travel is not).
- A4 - 621ha - includes Tretheway Lake, to allow motors, cached boats, snowmobiles in a wilderness class park and zone.
- A5 - 5ha - "the primary purpose of the zone is to provide winter access by snowmobile to A5S." in a wilderness class park and zone.
- A5S - 377ha - snowmobile zone in north basin of Makobe Lake in a wilderness class park and zone.
- A6 - 78ha - to allow motors on part of the South Channel of LE River in a wilderness class park and zone.

CPAWS OV is concerned that the Gamble Lake access point A2, 66ha, extends rather farther into the park than is necessary for back country access; this appears to be to ease the access of the illicitly permitted motor boats, which are not allowed in Wilderness Class Parks. We recommend that the access road go no farther than Weekend Lake, a short distance inside the park boundary. This will ensure that wilderness canoeists traveling the route from the Lady Evelyn River to Smoothwater will not encounter a parking lot and access point in the heart of the park.

CPAWS OV is concerned by the statement on p 21 of the plan concerning A5: "As knowledge is gained about the state of the fishery, a determination to extend motorized use to the open water season may be considered." CPAWS OV points out that no use of mechanized travel is allowed in Wilderness Class Parks. This is independent of any other consideration.

THE RIVER PARKS

CPAWS OV notes that "The park boundary extends 200 metres from waters edge on either side of the river" concerned - p22. CPAWS OV requests that the river beds and their respective water columns be specifically included within the parks.

CPAWS OV also notes that the 200 metre boundaries of the waterway parks is considered a minimum by the MNR, and urges that they be expanded in cases of ecological or other need.⁴ This would apply to the Spirit Rock area. CPAWS OV urges Ontario Parks to amend the TLUP to allow a greater circle of protection around the

Spirit Rock.

RE: SECTION 9 RESOURCE STEWARDSHIP POLICIES - APPLIES TO ALL 5 PARKS

- CPAWS OV opposes insect and disease control - we oppose the use of biocides in all circumstances - a park value is to let nature take its course. p29 - 9.3
- CPAWS OV urges the early creation of a fire management plan, as suppression is the fallback without a plan. p29 - 9.4
- The Parks are the animals only home. Therefore CPAWS OV supports the actions implied by the statement "The closure of areas may be necessary to reduce negative human-wildlife encounters. - p29 - 9.5
- CPAWS OV supports the phasing out of trap lines by 1 January 2010. No extensions should be allowed. Status Indians should be excepted.
- CPAWS OV urges the phase out of Bear Management Areas (would be more properly known as "death zones for bears") within the Parks on a similar timetable to that of the trap lines. P30 - 9.5
- Fisheries Management. Note that parks should have more protection than the surrounding landscape. p31 - 9.6
- CPAWS OV opposes commercial baitfish catching and removal and their use within all the parks (& CRs & Crown Land). We oppose transfer of existing permits. p32 - 9.6
- Non-native species are better controlled before they are set loose. Thus, CPAWS OV opposes the use of bait fish in parks (in fact, we oppose their use everywhere). Mostly, once unleashed, aliens are hard or impossible to control. p33 - 9.7
- The Recreation Management section refers to encouraging "low impact" activities. But the whole thrust of this plan seems to be to allow snowmobiling and motorboats, two high impact activities. This is to be achieved through non-conforming access zones. CPAWS OV recommends the removal of the non-conforming mechanized options from the Preliminary Plan. p35 - 10.1
- CPAWS OV opposes the construction of new hiking trails in a Wilderness Park. p36 - 10.1
- CPAWS OV opposes new consumptive activities in parks, including dog sledding, mountain biking, rock climbing and various water sports. This applies especially to wilderness parks. The place is a Park, not an amusement centre! p37 - 10.1
- CPAWS OV opposes campsites where pit privies are not feasible. p37 -10.1
- CPAWS OV recommends that old roads be de-commissioned, not just not maintained p38 -10.2
- CPAWS OV urges that a deadline be set for relocation of the snowmobile trail, now east of Ishpatina Ridge, to a location outside the Park. Without time lines being established, little will happen on this project. p39 - 10.2
- CPAWS OV urges that the fraudulent access areas should be eliminated as both snowmobiles and motor boats are prohibited in Wilderness Parks, and must not be allowed in the case of LE-S. p39, 40 - 10.2
- CPAWS OV opposes the use of ATVs by trappers or baitfishers. How can such use not degrade the area in which they are used? How much is too much? p40 -10.2
- Ecological sustainability (and Ecological Integrity) refers to ecological factors, those

which refer to the health, vitality and diversity of the landscape; social and economic components should have no place within a wilderness park. p41 - 10.3
- CPAWS OV recommends that educational efforts should include the topics of ecology and protection. p42 - 10.6
- CPAWS OV opposes the concept of “wise use” when referring to parks. The primary purpose of parks must be to protect that which they contain. p42 - 10.6

CONSERVATION RESERVES

- CPAWS OV opposes insect control measures. p36 - graph
- CPAWS OV opposes all human access to the Lady Evelyn Sand Dunes. (From personal experience, it is very difficult to climb up on them without knocking down a great deal of sand.) There should be signs to this effect posted on the dunes, along with, perhaps, the reasons. p38 - 4.2.1

Yours truly

ENDNOTES

1.
From http://www.mnr.gov.on.ca/mnr/forests/public/publications/wilderness_policy.pdf
Ontario's Approach to Wilderness: A Policy May 1997 (Version 1.0)

The below is from page 8:

Wilderness Parks are managed through the establishment of zones:

- Wilderness Zone: This zone includes wilderness landscapes of appropriate size and integrity to protect natural and cultural values, and support remote recreation.
- Nature Reserve Zones: These zones include the significant biological and geological features
- Access Zones: Access zones are small staging areas that provide parking and other basic facilities. Normally, only one access zone is established in each Wilderness Park.
- Historical Zones: In cases where Wilderness . . .

2.
p22, Algonquin Park Management Plan

3.
Access Zones serve as staging areas where minimum facilities support use and access to nature reserve or wilderness zones and natural environment zones. Access zones

provide, and regulate, use in areas of a park geared towards more extensive recreation. Development is generally limited to roads, visitor control structures and group campgrounds. There may be limited orientation, interpretive or educational facilities, which are generally self-use. Limited facilities for research and park management may also be present.

Infrastructure is intended to meet the needs of park visitors entering or exiting from the park's interior. As such, only very basic facilities are provided. Throughout the five parks in Temagami's backcountry (wilderness and waterway) the overall intent is to provide minimal facilities in order to preserve the remote backcountry experience.

4.

“As such, boundaries must be at least 200 metres from the shoreline (normally the high water mark), and should take into account lines of sight, proximity of landforms, and ecological integrity. The 200 metres should be treated as a minimum standard - wider corridors where appropriate, or large nodes to protect concentrations of significant features are both real considerations.” P35 of Ontario Provincial Parks - Planning and Management Policies.