

November 27, 2013

Jennifer Lukacic  
Acting Park Superintendent  
Ministry of Natural Resources  
Atikokan Area Office  
108 Saturn Avenue  
Atikokan, Ontario P0T 1C0

**Re: EBR Registry No. PB06E2023 Quetico Provincial Park Preliminary Management Plan**

Dear Ms. Lukacic:

The Ottawa Valley Chapter of the Canadian Parks and Wilderness Society (CPAWS-OV) has for decades been involved in the various management planning processes for Quetico Provincial Park because of its position as the flagship wilderness park in the Ontario parks system. We wish to make the following comments on the Preliminary Management Plan.

***Comment #1: Namakan hydro-electric development proposal threatens ecological integrity of Quetico Park, ecological link between Quetico and Voyageurs National Park, species at risk, and the canoe route network***

Despite our emphasis on the importance of this issue during the Management Planning Options phase, *as well as similar comments of many others* (as reported in Appendix 3, p. 90), the Preliminary Management Plan barely mentions the Namakan hydro proposals (p. 31).

This is totally unacceptable because:

(a) The proposed industrial development of the Namakan represents the most serious threat to the integrity of the Park and the Quetico-Superior wilderness in many years.

(b) Park managers are expected to “consider potential impacts on park values and features from activities occurring on adjacent lands” (as stated, for example, in the Management Options document, p. 23), and in reviewing development proposals on adjacent lands, they are to consider “impacts of the proposal on ecological integrity, water quality, the experience of remoteness, noise levels, viewsapes, travel routes and wilderness integrity” (Preliminary

Management Plan, p. 32), all of which will be affected negatively by the Namakan hydro proposals.

Therefore we ask that the Preliminary Management Plan be amended to include the following information:

(a) a full description of the proposal(s) for hydro development.

(b) a description (and map) showing the location(s) of the proposals with respect to Quetico, Voyageurs National Park and the Boundary Waters Wilderness.

(c) the fact that the Namakan forms a direct ecological link between Quetico and Voyageurs National Park which will be damaged by hydro development.

(d) a discussion of the potential effects of hydro development on species at risk (e.g. Lake Sturgeon, Pygmy Snaketail dragonfly).

(e) Lake Sturgeon were elevated to threatened status in NW Ontario because of the threat from hydro development on the Namakan River. Recent studies have shown that Lake Sturgeon migrate up and down the Namakan and into Quetico Park and hence hydro development will have a direct effect on this species at risk in the Park.

(f) the only known location in Ontario of the Pygmy Snaketail dragonfly, a designated endangered species, is on the Namakan River. The recently released Recovery Plan for this species clearly states that *“The greatest potential threat to the Pygmy Snaketail in Ontario is the impoundment of running waters”* (p. iv). The recovery plan goes on to emphasize the danger to this species of a hydro development on the Namakan: *“Tennessee (1993) reported that in the Appalachian Mountain range it was found only in ‘undammed and relatively undisturbed rivers’. Any dam on the Namakan River could therefore affect the Ontario population if it eliminated the swiftflowing waters and the constant supply of fine sediment which the species needs. A dam can stop the downstream flow and deposition of fine sediment, “armouring” or coarsening the river bottom with coarse gravel or pebbles (Donnelly 1993)”* (p. 5).

(g) the Namakan is an integral part of the internationally-known network of wilderness canoe routes of the Quetico-Superior wilderness. This network will be damaged by the proposed development.

In addition, the relevant documents related to Lake Sturgeon and Pygmy Snaketail should be included in the reference list.

Finally, and most importantly, there should be a description of the steps that are being or will be taken to prevent hydro development on the Namakan in order to ensure that the ecological integrity of Quetico Park, the ecological

integrity of nearby parks (Voyageurs, Boundary Waters Wilderness), the ecological link between them, species at risk and the Quetico-Superior wilderness canoe route network are preserved for future generations.

**Without the inclusion of this critical information, referencing and discussion, the Management Plan cannot fulfill the first guiding principle of the management of provincial parks which is to maintain their ecological integrity.**

Other comments:

In addition to our concerns about the glaring lack of information and discussion about proposed Namakan hydro development, we wish to make the following additional comments concerning the Preliminary Management Plan.

**Comment #2: Proposed “Day-use” Wilderness Zone**

We reiterate our concern that creating a new type of Wilderness Zone (one that is not consistent with the term Wilderness as previously defined) near French Lake sets a bad precedent for Quetico, other Wilderness parks and Wilderness zoning in general, and could allow various forms of development in Wilderness zones. Therefore, we strongly oppose the creation of such a zone in Quetico Park.

**Comment #3: Pickerel lake dam**

We oppose the proposal to maintain/rebuild the dam on Pickerel Lake, as it is not compatible with Quetico’s wilderness setting. There is no rationale for Ontario taxpayers to be asked to pay to permanently maintain such a structure which is serving no useful purpose in furthering the park’s mandate.

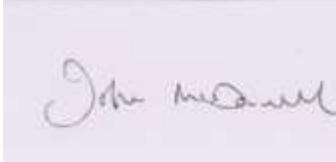
**Comment #4: Long distance backcountry trails:** We oppose the introduction of such trails in Quetico as there are already sufficient travel routes given the existing canoe route network. Wildlife needs some areas of the park where there is relatively little recreational travel, such as the northeast corner.

**Comment #5: Mechanized activities:** We support the aim of the Preliminary Management Plan to restrict aircraft landings in the park, to create a minimum flight altitude over the park, and to continue the ban on mountain biking and commercial dog sledding.

**Comment #6: Campsites and travel routes:** We support the proposal to maintain the status quo with respect to where visitors can camp and travel in the park. However, we ask that the statement on p.43 which indicates that large groups travelling together ... are *encouraged* to limit themselves to a maximum of two parties, and to camp separately ...” be corrected to indicate that they are *required* to camp separately.

We thank you for the opportunity to comment on the Preliminary Management Plan.

Sincerely,

A rectangular box containing a handwritten signature in cursive script that reads "John McDonnell".

John McDonnell  
Executive Director  
Ottawa Valley Chapter  
Canadian Parks and Wilderness Society