

**Comments on
Terms of Reference (revised) for
WABAKIMI, KOPKA RIVER & WHITESAND
Provincial Parks**

by

Canadian Parks and Wilderness Society

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The Ottawa Valley Chapter of the Canadian Parks and Wilderness Society has been working for the protection of Ontario's large wilderness areas and waterways for more than forty years. We have made a number of submissions over the years concerning Wabakimi and neighbouring parks, including a submission during an earlier process to establish a Management Plan for Wabakimi and Kopka River in 2003. Therefore, we wish to provide input to the current planning process for Wabakimi, Kopka River and Whitesand parks. In general our comments mirror those which we submitted in 2003. We hope that they prove helpful.

Summary:

The following issues are important if Wabakimi, Kopka River and Whitesand provincial parks are to be classified, zoned and managed in a manner that will ensure long-term protection of the Wabakimi area wilderness and its wildlife.

WILDERNESS CHARACTER, PARK CLASSIFICATION, ZONING: The management plan for Wabakimi Park must ensure that the entire park is maintained as a wilderness area, free from roads and all commercial development (except existing tourism lodges and camps). The best method for achieving this is to classify Wabakimi as a Wilderness Park (similar to the designation of Woodland Caribou as a Wilderness Park) and add the 1997 Addition to the Wilderness Zone that already covers the pre-1997 portion of the park. Sensitive sites (e.g. caribou calving areas) should be identified and zoned as Nature Reserves. Moose hunting and tourism facilities, that have been grandfathered-in, should be considered as non-conforming activities within the Wilderness Zone and Wilderness Park. Other non-conforming activities should not be permitted.

ACCESS and ROADS: To maintain the wilderness character of the park and ensure ecological integrity, access to the park should be only by canoe from its perimeter, by float plane at designated landing sites to access tourism facilities, or by rail along the CNR line. No new roads should be built within or adjacent to the park, and existing logging roads should be rehabilitated.

SPORT HUNTING: The existing hunting ban in the “original” (pre-1997) portion of the park should be maintained. Although moose hunting has been grandfathered into the 1997 Addition, it should be strictly regulated and restricted to appropriate areas (e.g. prohibit in sensitive areas such as Nature Reserve zones). Hunting of other species should not be permitted, as hunting is not consistent with the principle of ecological integrity.

TOURISM FACILITIES: Although existing lodges and outpost cabins have been grandfathered into the park, no new tourism facilities should be permitted, and no expansion of existing facilities should be allowed.

MOTORBOATS and JET-SKIS: Motorboats are an intrusion on the park wilderness. They should only be allowed in relationship to existing tourism facilities and on designated lakes. Their numbers should be limited on some lakes that are already overcrowded. Some large portions of the park should be established as off limits to motorboats to allow a true wilderness experience and to maintain ecological integrity. A motor size limit should be put in place throughout the park. Jet-skis should be banned throughout.

AIRCRAFT: Aircraft landings should be restricted to designated lakes, and allowed only to access to lodges and outpost camps.

TRAILS: No hiking, biking, skiing, ATV or snowmobile trails should be developed.

FIRE MANAGEMENT: A Fire Management Plan should be developed to ensure that a natural fire regime is maintained in and around the park.

CONNECTIVITY: Maintaining healthy wildlife populations in NW Ontario in the future will depend in large part on how well connectivity is maintained between parks, conservation reserves and other natural areas. Therefore connections between Wabakimi, Kopka River and Whitesand parks and other nearby areas should be addressed in the management planning process.

Specific Comments on Terms of Reference document:

3: Planning area

Greater Ecosystem approach: Development close to park boundaries can have a significant effect on park ecosystems and values. A “greater ecosystem” approach should be taken to management of the three parks to ensure that development outside the boundary does not compromise park values.

Scope of Management Plan: We support the inclusion of all three parks in the planning process for the reason outlined in the document. It would be useful if management of the adjacent conservation reserves was also included.

4.1: Ecological Integrity

Park classification: CPAWS-OV recommends that Wabakimi Park be classified as a Wilderness Park to protect its remote, wilderness character, as has occurred for Woodland Caribou Park which has a rather similar features and activities to Wabakimi. Following the Provincial Parks and Conservation Reserves Act, maintaining ecological integrity should be the guiding principle of management planning for the three parks.

Roads: If Wabakimi is to retain its remote, wilderness character, it is important that roads not be permitted within its boundaries.

Consumptive activities: With 7 main base camps and 44 outposts in the parks, along with heavy motor boat use on some lakes, CPAWS-OV recommends that no new consumptive activities be permitted, and that no expansion of existing facilities be permitted. In particular, hunting should not be introduced into the pre-1997 portion of Wabakimi. Moose hunting which was grandfathered into the 1997 Park Addition should be considered a non-conforming use and restricted to appropriate areas in the Addition. Hunting for other species should not be permitted.

4.2 Resource management

Zoning: As has occurred in Woodland Caribou Park, CPAWS-OV supports zoning of the 1977 Addition as Wilderness, with sensitive sites related to caribou calving, brook trout, etc. zoned as Nature Reserves.

4.3: Infrastructure and economic development

Roads and built infrastructure: CPAWS-OV recommends that there be no roads constructed within the parks to maintain their ecological integrity and their remote, wilderness character and that existing roads, bridges and culverts related to forestry be removed. Campgrounds, tourism accommodations or other infrastructure should be placed outside the park boundary, preferably in the vicinity of Armstrong, where they can be readily accessed.

4.4: Research and 4.5: Monitoring needs

CPAWS-OV supports the statement in the document that “identification of existing and potential threats to the ecological integrity of the parks and their greater park ecosystems, as well as early advice on options to mitigate and better manage threats, is crucial to the well being of protected areas”. Research and monitoring will play an important role in maintaining the parks’ ecological integrity. Enforcement of regulations will also be critical.

4.3: Aboriginal community involvement

Nearby First Nations can provide valuable input in terms of traditional knowledge, cultural sites, archaeology and travel routes. CPAWS-OV believes that economic opportunities for First Nations are important (see Additional Specific Comments, #2.0 below).

Additional Specific Comments bases on the Interim Management Plan which are relevant to the current planning exercise:

2.0: *Aboriginal interests*: It is important that nearby First Nations share in the economic benefits that Wabakimi will provide. In order to ensure that this can be done without increased commercial development within the park and diminishing its ecological integrity, CPAWS-OV supports the conversion of some existing tourism infrastructure and operations in the park to Aboriginal opportunities as described in the Interim Management Plan. In addition, other tourism facilities could be developed outside the parks, especially in the vicinity of Armstrong.

3.6: *Non-native trapping*: Trapping is not consistent with the principle of ecological integrity. Non-native trapping should be phased out.

4.3: *Logs for building construction and maintenance purposes*: Construction of new lodges, camps or other buildings should not be permitted in the park. Camps should not be permitted to expand. Therefore, there should be no need for “building construction”.

5.0: *Fisheries Management*: We agree that it should be “aimed at the maintenance and enhancement of native, self-sufficient fish populations.”

5.4: *Bait fishing*: Should be prohibited throughout.

6.1: *Water level control*: We agree that there should be no new hydro electric development and no expansion of existing facilities related to the Ogoki Reservoir.

6.2, 6.12: *Aggregate extraction and mining claims*: We support the ban on these activities.

6.5, 6.7, 6.8: *Land Use Permits*: We agree that no new LUPs should be given out.

6.13: *Boat caches*: We support the ban on new boat caches.

9.1-9.5: *Trails*: We suggest that no hiking, biking, or ski trails be developed. Mountain biking should be prohibited throughout the park because of the destructive nature of this activity.

10.3: *ATVs and snowmobiles*: Should be banned throughout. Trails should not be developed. This is a wilderness area and should not be considered as a playground for motorized vehicles.

12.2: *Signage*: Signage is not required or desirable in a wilderness setting (cf. Quetico and Woodland Caribou Provincial Park, where there is no signage at portages, campsites, etc.).

12.10: *New tourism facilities*: This is a wilderness area and tourism facilities detract from its wilderness character. No new facilities should be permitted. Existing facilities should not be permitted to expand. New tourism facilities should be developed *outside* the park.

Sincerely,

John McDonnell
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