

**To: Jeffrey Cameron RPF,
WN Forest Plan Author
NorthWinds Environmental Services
195 Park Ave.
Thunder Bay, Ontario, P7B 1B9
807-631-8744**

**Fr: Vern Fish, President
Friends of Wabakimi
vernfish@aol.com**

**Re: Stage Four Comments
Wabadowgang Noopming Forest (WNF)
2023-2033 Management Plan**

Date: July 31, 2022

Dear Mr. Cameron,

Friends of Wabakimi

As you know, I represent the Friends of Wabakimi (FOW) on the Wabadowgang Noopming Forest LCC. The Friends of Wabakimi is a non-profit organization registered in the Province of Ontario. Our mission is to “*advocate for the protection and preservation of the diverse natural, cultural and historical resources of the Wabakimi Area*”. The FOW define the Wabakimi Area as a 2,572,734 hectare virtually roadless tract that includes Wabakimi Provincial Park and a host of surrounding provincial parks, Conservation Reserves and Crown land. The Wabadowgang Noopming Forest (WNF) is part of the Wabakimi Area.

A Sense of Wilderness

I attempt to keep the Board of Directors up to speed on the progress of the forest management plan for the WNF. They feel that maintaining a sense of wilderness in the WNF is an important value to be preserved.

FOW’s priorities and concerns fall under the following topics:

- 1) Ecological integrity and sustainability
- 2) Protect critical habitat for species at risk
- 3) Maintaining a healthy and sustainable woodland caribou population
- 4) Protect exceptional recreation and tourism values adjacent to Wabakimi Park:
 - *Maintain existing and potential wilderness tourism business opportunities
 - *Preserve historical canoe routes that directly or indirectly connect to adjacent provincial parks
 - *Allow limited access to historical canoe routes across the WNF

Crown Land Use Policy Atlas (CLUPA)*

The policies of CLUPA 2616 covers the WNF north of the Big River. “*Road access will be managed to maintain commercial tourism and fish and wildlife habitat. Operating and annual plans will contain specific guidelines for the protection of tourism values and fish and wildlife habitat.*”

We understand that forest management and logging are allowed in CLUPA 2616. We appreciate the effort that has gone into using the McKinley Road to access Block AB-3 to avoid building a road between Caribou Lake and D’Alton Lake. We note the effort to prevent road access to the Michell Lake and creation of buffers to insulate historic canoe routes. We also note the effort to decommission secondary roads once they are abandoned.

We also note that even though the Big Lake Road is signed “*Road closed to unauthorized vehicles. Access prohibited under PLA. This gate is currently open, and the intent is to keep it open.*” (Page 179). We assume

this means that recreational paddlers can still use the Big Lake Road to access the Big Lake and the Big River. As noted, the FOW encourage limited access to historical canoe routes.

**Please note that on page 73 of the Management Plan it appears that CLUPA 2616 has been mislabeled as CLUPA 2619.*

Species at Risk

CLUPA 2616 does focus attention on maintaining fish and wildlife habitat. Page 198 of the draft forest management plan notes that “*known nests will not be destroyed*”. Page 47 provides a list of birds identified as Species at Risk. This list includes: Canada Warbler, Olive Sided Flycatcher, Common Nighthawk and the Bald Eagle. All of these bird species and many more have been identified along Big River canoe route which includes the Reef Lake Peninsula. Evidence of caribou was also found along the Big River. The attached memo, **Reef Lake Peninsula Harvest Area**, provides details and supporting documentation.

As a result of this documentation, the following motion was approved by the Board of Directors of the Friends of Wabakimi at their June 26, 2022 meeting.

“To maintain the habitat and the wilderness values of this potential conservation reserve, the Friends of Wabakimi strongly recommend that the Reef Lake Peninsula NOT be considered for logging.”

Herbicides & Rocky Road

In the **Summary of the Wabadowgang Noopming 2033-2033 Forest Management Plan** on page 10, herbicide use was identified as a major issue. At this time it is unclear as to whether herbicide use would be acceptable to all stakeholders particularly in the areas that the Rocky Road would make accessible. If herbicides are not acceptable and cannot be used as silviculture strategy to regenerate the forest after the cut, will this block still be logged? If not, will the Rocky Road still be needed?