

Memo

**To: Shannon Lawr
Park Superintendent
Wabakimi Provincial Park
Ontario Parks**

**Fr: Vern Fish, President
Friends of Wabakimi**

**Re: Additional Background Information to
Background Information for Wabakimi, Kopka River and Whitesand**

Date: June 3, 2023



*Wabakimi
by Kevin Belmore*

Introduction & Prologue

The Friends of Wabakimi (FOW) is an Ontario Non-Profit that was created in 2014 by Phil Cotton. The FOW is truly an international organization with members in five time zones and Europe. Our vision is that *the Wabakimi Area* shall be an exceptional destination for wilderness recreation activities for the benefit of present and future generations of visitors.* The Wabakimi Area is really an international park that draws visitors from around the world to experience the boreal wilderness.

We hope to accomplish this vision through volunteer stewardship initiatives and in collaboration with government agencies, non-government organizations and other stakeholders. As such, the Friends of Wabakimi *will participate in planning processes to advocate the protection and preservation of diverse natural, cultural and historical resources* of the Wabakimi Area.*

Thus, the Friends of Wabakimi welcome the arrival of the Background Information as a beginning step in the park planning process. We are impressed with the work that went into creating a document of this scope and depth. We have asked our membership, which stands at 320, and board members to frame their responses to this document. I have attached all of these letters to my comments. Please note, individual board members have different opinions on some of these points.

What follows is my attempt to summarize and these responses. I found that some of these responses echoed what Phil Cotton wrote in his document, **Recommendations for Management Plans for Wabakimi, Kopka River and Whitesand Provincial Parks**, several years ago. Thus, the current board is seeing some of the same issues but they have also identified several new challenges that must be addressed.



The FOW is excited and poised to lead, support and collaborate on many of our recommendations below. Over the past few years the FOW have worked closely with the park staff to raise money for debris clean up, interpretative signage and song bird meters. We have worked hand in hand with the park staff and a local artist, Kevin Belmore, to create a signature piece of art called Wabakimi. This art will be used on the interpretative kiosk being placed in Armstrong and is being sold locally in Thunder Bay. Our profits from these sales are going to the Thunder Bay Indigenous Friendship Centre.

As a part of our efforts to make Wabakimi “*an exceptional wilderness destination*” our volunteers have been to nearly every lake, portage, rapids, swift and waterfall in the Wabakimi Area. This knowledge has been used to create the Wabakimi Planning Map which we recently updated in partnership with the park staff. Working with Laurence

Mills, who is a Canadian map maker and serves on our board, we are creating an extensive series of route maps which will eventually cover almost all of the historic routes that cross both Crown land and provincial parks in the Wabakimi Area.

We offer a member newsletter and maintain a social media presence with a website (www.wabakimi.org) and a Facebook page. We collect and post trip reports and other information on our social media. We host webinars, rendezvous, photo contests and provide visitor education that aligns with the preservation of the wilderness. In the last year the FOW have hosted informational booths at five large paddling expos and outdoor shows in both Canada and the USA. Our international board is working to both promote and protect this huge boreal wilderness. We are an active, hands board of directors with diverse background who meet regularly with working committees. We are ready and able to work with Ontario Parks on the park management plan.

**An area stretching from the Albany River south to Ottertooth Conservation Reserve and Hwy 599 east to the Attwood River Conservation Reserve and Mojikit Conservation Reserve.*

Comments

First Nations

Nothing in the recommendations we submit should in anyway be construed to rescind existing traditional or treaty rights of the First Nations that surround these parks.

An Advisory Committee

A committee comprised of stakeholders should be created to partner with Ontario Parks during the park management planning process. **The Friends of Wabakimi is willing and eager to serve on this committee.**

Park Maintenance

A schedule of portage maintenance should be created to include all existing canoe routes within the park(s) as well as canoe routes on Crown Lands that are used to access the park(s). This maintenance schedule should include regular monitoring and disposal of trash at campsites, access points and portages.

Volunteer Stewardship

Ontario Parks should create a program that encourages individuals and organizations to volunteer to monitor the condition of portages, campsites, and access points. This volunteer program should also assist in the management of wildlife. This program should include using volunteers to maintain portages and assist with park maintenance.

Outpost Cabins & Lodges

Cabins & lodges do provide access by floatplane to the interior of the park which helps spread out users. They also provide a place where a pilot feels safe to land during an emergency exit. However, the expansion or development of new tourism establishments should not be permitted. Ontario Parks should work with non-profits, foundations, NGO and other government agencies to finance the gradual reduction of tourism establishments within these parks by acquiring them at fair-market value from willing sellers as they become available. A priority should be placed on removing facilities in highly sensitive natural areas.

Park Classification

The long range goal should be to classify the expansion area of Wabakimi as a wilderness class park.

Mechanized Travel

The long range goal should be to eliminate mechanized travel in the park(s). This can only happen if all of the outpost cabins and lodges are removed. Roads and permanent, groomed trails should not be allowed in the park(s).

Cans & Bottles

Non-reusable cans and glass bottles should not be permitted in the park except at existing cabins, lodges or on private land.

Park Access

Access to the park should be limited to self-propelled water craft, float plane and rail.

Disperse Visitation

Access points and canoe route launch points should be developed on the Crown Lands adjacent to the parks with the goal of dispersing visitors over a wide area to maintain a “sense of wilderness,” mitigate human impact and maintain the ecological integrity of the landscape.

Rail Access

Ontario Parks should coordinate with the Canadian National Railway to create safe canoe launch sites adjacent to the rail right-of-way to avoid impact on private land. A uniform system of reflective signage should be established along the CNR right-of-way to indicate the location of canoe launch sites. Campsites should be created adjacent to rail accessible canoe route sites to accommodate park visitors arriving by rail and waiting to leave by rail.

Fishing

To support ecologically sustainable sport fishing recreation, daily catch and possession limits should be restricted to those permitted by conservation licenses. The use of barbed, treble hooks and live bait should not be permitted. A fishery stewardship/conservation plan should be incorporated into a park wildlife stewardship/conservation plan.

Wildlife Management

A wildlife/fishery conservation plan should be developed in concert with the proposed park management plan. This plan should identify islands, peninsulas and other areas critical to woodland caribou and other wildlife of concern. Human access to these areas should be reduced or restricted to protect critical wildlife habitat. The wildlife plan should include provisions for educating visitors on how to reduce their impact on wildlife and the landscape.

Cached Boats

Cached boats should be required to have dated Cache Boat Permit (decal) attached within one year of the final approval of the park management plan. Any boat not bearing a Cache Boat Permit (CBP) should be subject to removal. Once the number and location of cache boats is established, the park staff should summarize the ecological impact of these boats and create a plan to limit boats as needed to maintain a “sense of wilderness.”

Shore Lunch Sites

Shore lunch sites should be available to be used as backcountry campsites. These sites should not be cluttered with picnic tables, fish cleaning stations, docks, propane barbecues and other structures.

Park Revenues

Ontario Parks should develop a revenue model to finance improved operations and create the administrative infrastructure capable of managing visitation while protecting ecological integrity of this huge wilderness complex. This could include fees for camping, vehicles, motor boats, cache boat permits, and aircraft landing fees. Fees collected should go back into the management of these parks.

Economic Development

Special attention should be given to creating opportunities for members of the many First Nation communities that surround the park to create businesses that support eco-tourism within the park(s). It is also important to maintain and **encourage the creation** of businesses to meet the outfitting needs of park visitors. There is a **potential crisis** looming in the near future as existing outfitters plan for retirement. Without these services the public will have little to no access to this huge wilderness. This will only deepen the lack of economic development in Armstrong.

Cultural Sites

The Beckwith Cabin, the Ogoki Lodge and Cliff Lake are examples of cultural sites that require more thought and discussion as to their management and future. These unique and sensitive sites require special attention from a panel of stakeholders and experts to determine their long term management and their place in the park management plan. The park plan should include strategies and efforts to educate park visitors on how they can help protect these sites.

Visitor Use Data

To make informed decisions, park planners need to understand the demographics, needs, wants and desires of their “customers”. The park staff should consider expanding the collection and analysis of visitor statistics. This information needs to include all visitors which will include anglers at outpost cabins in addition to backcountry paddlers.

Recreational Carrying Capacity

The issue of use vs abuse must be addressed before the number of visitors becomes too high. A monitoring system needs to be established and reviewed annually to determine the carrying capacity of the wilderness for the visitor, the landscape and the wildlife. This system needs to take into account the number of fly-in visitors to fishing camps. This may lead to quotas and will require an ongoing educational program. An educational program may require interpretative naturalist(s) and possibly an interpretative center.

Education/Interpretive Naturalist

As noted, Wabakimi is an “international” wilderness area. Visitors come from all over the world and they need the opportunity to learn about cultural and natural history of the region to better understand how they can protect and preserve the wilderness and its wildlife. This can be done online, with documents, brochures, signage, as well as in-person, at paddling expos and in an interpretive center. This education component needs to be addressed in the management plan. The FOW can help play a role in this educational process by coordinating our messages with the park staff and the management plan.

Individual Board Member Comments

I. Comments of Trevor M. Twose, member, Friends of Wabakimi Board of Directors and Canoeist

General Comments, affecting many aspects of planning

1. To inform most decisions, attention should be given to understanding the ‘customers’ – what types of customers (canoe trippers, canoe base campers, fly-in sports people, etc.), their demographics, needs, wants, desires for solitude, desires for maintained amenities (e.g., portages). Planners are encouraged to think in certain contexts of visitors as ‘customers’ in a competitive market place. Wabakimi is different from many established wild areas in that the majority of customers need to travel longer distances, are less likely to do short trips e.g., of less than 7 days. The Parks should consider expanding the collection and analysis of visitor statistics. Friends of Wabakimi believes that the combination of travel distances and the limited length of vacation time is the single greatest constraint on potential visitors.

Consideration should be given to how this affects marketing of the Parks, and how it affects customer behavior.

2. It is possible that the two current canoe outfitters in the Armstrong area may disappear in the next 1-5 years. This could massively impact use of the parks by canoeists. In time, market forces may encourage new outfitters to set up. Consideration should be given to how to manage this situation in the short- to mid-term. Consideration could be given for the parks or a private operator to establish secure parking (possibly temporary), and to encourage local people, including First Nations people, to offer shuttle services, e.g., via Uber. Consideration should be given to whether Friends of Wabakimi, or others (e.g., retired outfitters, guides), might be able to provide customized trip planning services.

3. Consideration should be given in particular to opportunities for low-startup cost, part-time, manageable economic development opportunities. These are the engines for economic development, and successful start-ups may eventually become important drivers of the local economy.

10.2 Park Zoning

Access Zones

The experience in the BWCAW is that a shift from touring (moving on most days) to base camping has led to high occupancy of campsites within a day’s travel of access points.

Consideration should be given to how many access points and nearby campsites are needed, and whether popular, access zone campsites need pit toilets, fire grates etc.

10.3 Planning Considerations

10.3.1 First Nations and Local Communities

Consideration should be given in particular to opportunities for low-startup cost, part-time, manageable economic development opportunities. These are the engines for economic development, and successful start-ups may eventually become important drivers of the local Economy.

10.3.2 Access

The experience in the BWCAW is that a shift from touring (moving on most days) to base camping has led to high occupancy of campsites within a day's travel of access points.

Consideration should be given to how many access points and nearby campsites are needed, and whether popular, access zone campsites need pit toilets, fire grates etc.

10.3.8 Recreation Management

On the subject of potential quotas, dispersal and reservation systems, attention should be given to understanding the 'customers' – what types of customers (canoe trippers, canoe base campers, fly-in sports people, etc.), their demographics, needs, wants, desires for solitude, desires for maintained amenities (e.g., portages). Planners are encouraged to think in certain contexts of visitors as 'customers' in a competitive market place. Wabakimi is different from many established wild areas in that the majority of customers need to travel longer distances, are less likely to do short trips e.g., of less than 7 days.

The experience in the BWCAW is that a distinct shift over time from touring (moving on most days) to base camping has led to high occupancy of campsites within a day's travel of access points, and this has definitely impacted the enjoyment of visits.

10.3.9 Visitor Services

Consideration should be given to whether any signage or any other signs of human alteration should be permitted in Wilderness Areas or other designated areas, to help preserve wilderness or other values.

Consideration could be given for the Parks or a private operator to establish secure parking, and to encourage local and persons, including First Nations people, to offer shuttle services, e.g., via Uber.

Consideration should be given to whether Friends of Wabakimi or others (e.g., retired outfitters,

guides) might be able to provide customized trip planning services in the event that Outfitters cannot offer adequate services.

10.3.10 Park Facility Development

The experience in the BWCAW is that a shift from touring (moving on most days) to base camping has led to high occupancy of campsites within a day's travel of access points.

Consideration should be given to how many access points and nearby campsites are needed, whether new access points or campsites are needed, whether certain access roads should be improved, and whether popular, access zone campsites need pit toilets, fire grates etc.

Consideration could be given for the Parks or a private operator to establish secure parking, and to encourage local and persons, including First Nations people, to offer shuttle services, e.g., via Uber.

10.3.13 Economic Development

Consideration should be given to encouraging or facilitating the establishment of new outfitting businesses. Could established outfitters in other Park areas be encouraged to expand to the Wabakimi area?

Consideration should be given in particular to opportunities for low-startup cost, part-time, manageable economic development opportunities e.g., home-based services, guiding, etc..

Consideration should be given to training courses, e.g., for guides. Small businesses are the engines for economic development, and successful start-ups may eventually grow to become important drivers of the local economy. Consideration should be given to potential partners in economic development, for training (e.g., of guides and outfitters) and as sources of grants.

II. **Comments by Bill Pyle, Friends of Wabakimi Board Member**

Errors Found:

2.3.4 Lake Access, page 18, Table 1. Under Wabakimi spelling of Pashkokoan Lake is incorrect, should be Pashkokogan Lake

7.2.5 Canoeing, page 60, Paragraph 4, "The organization has close to 200 members.." Should read: 325 members

Comments:

4.1 Ecological Integrity, page 20, paragraph 4

To maintain the ecological integrity within the park, disturbances of habitat on the boundaries have a significant influence upon the ecosystems and biodiversity for which the park is established. References are made to numerous policies and legislation strategies, with the caveat added: "but not limited to...". The Ontario MNRF State of the Woodland Caribou Resource Report of 2014 and the Collaborative Provincial Caribou Conservation Plan Parts 1, 2 and 3 should be cited. (These are listed under "11 References", at the end of the document)

7.2.5 Page 60, Table 6

Tabulated results should be available for the years 2019 through 2022.

III. Comments by Dave McTeague, Friends of Wabakimi Board Director

My impression is that the background document is an excellent review. However more data is needed concerning current use by paddlers, fishers, hunters and especially outpost visitors.

Regarding direct access to W.P.P. via roads. The Trail Lake road access to Tamarack Lake is currently used by outfitters and others. It's a great entry point to a lovely part of the park. That road is slated for temp. closure, improvements, to facilitate harvest. Any increase in use of this access needs to be evaluated or managed to keep these routes from overuse or negative impacts on caribou.

-The other direct access is Vista Road, which gets little use and is near Savant Lake. The park once promoted this on their Facebook page. [See Melissa Gray's trip report.](#)

-Smye Lake is another access point, albeit through Crown Land. I could see improvements at this access point (signage, trail clearing).

-Sassanach Lake also off the 702 road...no reports of any use of this entry point. So remote parking might be safe...or could be a drop-off

-The current Caribou lakes road access seems OK as is; albeit with use of outfitter shuttles and safe parking elsewhere.

-Most folks exit at the Pikitigushi River spot, not enter there.

-Drive-in access points with parking might be a good option for the Kopka route. (And the Crown Land access to the Collins River.) Doesn't this kind of already exist?

Limited direct access to W.P.P. is part of the Wabakimi story. I think that's OK. I don't see any other road access options.

I strongly agree better data is necessary for park use, and particularly by outposts & private inholdings. Outpost clients should be contributing to the park management with reasonable permit fees. Management to address use and impacts by those users needs to be addressed. I agree with John Holmes that outpost impacts should be evaluated and management to lesson those.

Removal of legacy debris and abandoned cabins is needed, and FOW maybe willing to assist in some way. Background info needed is identification of all those sites.

IV. Comments by John Holmes, Friends of Wabakimi Board Member

1. Fishing camps. Personally, I would prefer that they don't exist within the park, but I understand that they do bring some economic benefit to the local communities, and provide access to wilderness places to those unable to access them otherwise. I think more education about impacts should be given to the outpost camp visitors. Many of the lunch spot areas have items stored there like grills and

pans, even propane tanks. There are often fish cleaning tables as well. Garbage and fish guts are often present. Tighter rules for the outfitters on the location and use of these spots should be implemented and monitored. Conflict between canoeists and outpost camp users is mentioned several times in the background report, and would be reduced if the outpost camp users were seen to have a lighter footprint/impact on the area.

2. Cached boats. There are a lot of abandoned boats in the park. Many are crushed by fallen trees or rotted through. Some have old gas tanks and other junk underneath them. A greater effort to remove these should be made. FOW has contributed to this effort already and could do more.

3. The whole issue around Woodland Caribou preservation seems like it sorely lacks the data needed to make any informed decision. The usual tactic of continuing to talk about studying the issue until it is too late appears to be in play.

4. Access point parking. The access point parking seems woefully inadequate. Very few access points exist, and they each have only a few sketchy parking spaces. I realise many people park at an outfitter and get shuttled, but not everyone can afford that. A bit of parking with some park signage seems like a pretty basic requirement and should be better resourced.

V. Comments by Maurice Poulin, Friends of Wabakimi Board Member

Wabakimi, Kopka River and Whitesand Background Information Comments by Maurice Poulin

Road Access: I would like to see multiple “maintained” road access locations into the park boundaries accessing canoe routes. It is also highly suggested to create maintained parking lots for canoe entry, exit and shuttle options to access the canoe routes from lakes and/or rivers. This would greatly enhance the visitor experience, costs and relieve pressure on congested canoe routes.

Train Access: Via Rail will drop off/pickup canoeist who have reservations at “special stops” in the park. Some locations have campsites, and some do not. Sometimes the drop off or pick up times are late at night or early morning in the dark. The Rail stops are marked by mile post. All these stops should have a safe place to disembark, unload canoes, gear, a nearby campsite, easily identifiable portage, and a maintained portage. Trains are often late or rerouted creating long waits for canoeists waiting for a pickup. There should be a safe place close to the mile post where canoes and gear could be safely stored while awaiting pickup.

Rail stop locations like Schultz’s should have abandoned and derelict structures removed for safety reasons as well as increased available space potential for a late day / night campsite.

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Purpose of Provincial Parks:

We would like to see an emphasis on protecting the ecosystems of this natural region, with a focus on species at risk such as Woodland Caribou, Wolverines and important fish habitat; life science values; along with protecting biodiversity, maintenance of ecological integrity as a priority and an emphasis on “ecologically sustainable outdoor recreation”.

Wabakimi Provincial park was originally classified (1983) as a wilderness Park and in 1997 the park boundary was greatly expanded to most notably to protect Woodland Caribou yet this area remains unclassified, allows hunting, motorized watercraft with no engine restrictions and other motorized vehicles like ATVs and snowmobiles, chain saws, and large generators which are not conducive to protecting Woodland Caribou and protecting the life sciences values. If the entire park cannot be classed as Wilderness than it will most certainly need to have designated Park Zoning such as “Nature Reserve Zones”, “Wilderness Zones”, “Natural Environment Zones” as well as “Access Sones.”

Non-Native and Invasive Species:

Non-native species include invasive species, which can invade and greatly alter ecosystems. We know as a fact that plant species non-native to the Wabakimi ecoregion are found at land tenure sites, as well as shore lunch, portage roads and rail lines. Many

private cottages and commercial tourism facilities have groomed lawns and decorative plants. This must stop and be addressed.

Wildlife:

Woodland Caribou populations are listed as nationally “threatened” by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) and under the federal “Species at Risk Act (SARA). Woodland Caribou are also listed as threatened under Ontario’s endangered Species Act (ESA). Their range has receded northward in Ontario since the mid-1980s due to loss of habitat and increased predation related to human activities and development such as logging, road networks and other habitat changes.

We also know that the increase in white-tailed deer and moose carries parasites that affect Woodland Caribou.

Parks Ontario and MNRF have failed to track the yearly variability and movements of Woodland Caribou and other large mammals in and out of the park boundaries. Meanwhile, MNRF is deliberately allowing roads and clear cutting just outside the park boundaries in prime Woodland Caribou habitat. This includes impacting their range, sensitive calving areas and winter habitat and this is starkly exemplified in the recently approved Forestry Management Plan of Wabadowgang Forest even though there was significant opposition to this plan where expert Caribou scientist’s testimony was ignored.

Contrary to what MNRF promotes, clear cutting and silvicultural practices will not maintain large areas of mature forest (60 years of age and older) that caribou require. Caribou require ground lichens that do not regenerate well with clear cutting and roads. They do require intense fires to regenerate lichens. We know that Caribou do not obey park boundaries. Their range moves well outside of park boundaries and their individual home ranges are approximately 200-400 km² and they seek out the large, relatively unfragmented patches of mature open coniferous forest supporting enough amounts of ground lichens whether they are inside or outside of the park boundaries. Wabakimi, Kopka and Whitesands provincial parks exist in a fire-adapted boreal landscape which sustains the large, high intensity forest fires that are responsible for their existence. This cannot be duplicated with the false claims by MNRF in their Caribou Mosaic plan that says clear cutting caribou habitat is fine and they will use silviculture methods to restore lichens and the Caribou will eventually return. We also know that cumulative disturbances (natural or anthropogenic) around the perimeter of the park have dramatically limited the availability of winter caribou habitat on a landscape level and this must be addressed. Caribou will not remain in the park boundaries and the surrounding crown land and forest management plans must reflect the habitat requirements of Caribou. We must also allow larger fires to burn as they play an important role in creating future tracts of even-aged, conifer-dominated forest that caribou require. Fires are critical to renewing winter woodland caribou habitat as they help to regenerate terrestrial lichen, which comprises the bulk of their winter diet.

To date, MNRF has completely ignored the Caribou Conservation Plan (CPP). To be clear, one of the priority actions to achieve protection and recovery of caribou is to enhance caribou habitat. Caribou have evolved with and adapted to fires that both change and renew the habitat in which they live. All caribou habitats inside and outside of the parks must be protected and enhanced. Caribou do not adapt to logging roads, mining roads, clear cutting and mining.

We ask the park planners to place an importance and priority to the development of a vegetation management plan for Wabakimi to consider the quality, supply, and location of Caribou habitat “within” Wabakimi, as well as the relationship to, and integration with, caribou habitat supply and the associated caribou habitat tracts on the adjacent managed (crown land / forestry management forest) landscape.

We also believe that managing forest fire response would ensure a balance is made between protecting current sensitive winter caribou habitat and renewing future habitat by creating a dynamic mosaic of sufficient amounts of caribou habitat at varying stages of maturity.

The core of winter caribou range and calving habitat identified in the background document (page 34) should receive some type of special protection classification or zoning. Please refer to Appendix 1, the map in Figure 8 shows the seasonal distribution of woodland Caribou within Wabakimi and outside of the park.

Wolverines:

Wolverines are in Wabakimi provincial park but due to no research on this mammal we know very little about their range and locations other than what has been captured on trail cams, observed tracks and fur trappers. That said, they are of “special concern” by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) and have been given a “threatened” designation by

the Committee on the Status of Species at Risk in Ontario (COSSARO). What we do know is that they prefer habitat very similar to Woodland Caribou. The Wabakimi/Kopka/Whitesands and surrounding crown lands are within the current wolverine range. The parks do provide suitable habitat and a prey base for this wide-ranging, sparsely distributed carnivore with an aversion to human disturbance. We need much more data and a plan to protect and improve their habitat.

Fishing Communities:

The known data relies on a study from the Broadscale Monitoring program (2012-2014) and only covers 9 lakes but no rivers. There seems to be little data on the productive capacity of waterbodies, and this is most certainly an important missing link in the management of fish populations. Sadly, there is no data on the impact of resort and outpost anglers on the fishery. Species at risk like Lake Sturgeon have basically no research and no date to develop a management plan. This must change.

Boat Caches:

There are numerous boat caches throughout the parks and there do not appear to be any regulations of inspections taking place. There are numerous abandoned outfitter boats throughout the park as well as old outboard motors. This all-needs a thorough review. There clearly is a need for new regulations and a permit structure.

Canoeing:

In the International Canoeing Community, Wabakimi Provincial Park, Whitesands Provincial Park and Kopka River Provincial Park are well known as an exceptional world class "wilderness canoeing destinations." The Wabakimi Area includes all of Wabakimi Provincial Park, Attwood River conservation Reserve, Mojikit Conservation Reserve, Whitesand Provincial Park, Kopka River Provincial Park, Obonga-Ottertooth Provincial Park, and Brightsand River Provincial Park, as well as parts of Upper English River Conservation Reserve between Pipio Lake and Metionga Lake and Albany River Provincial Park from Osnaburgh Lake, all of which are managed by Ontario Parks. It also encompasses portions of the Caribou, English River, Black Spruce, Lake Nipigon and Ogoki Forest Management Units managed by the Ontario Ministry of Natural Resources & Forestry.

All of these separate Forestry Management Plans and Park Plans become very discombobulated to the overall management of the resource and to the users of the resource. The park management plans need to be done in such a manner that works together for the permanent protection of this system of provincial parks, conservation reserves and crown land that includes at the forefront the ecosystems that are all interrelated to each other. Biodiversity and a focus on the species at risk must be not only maintained but the priorities. All these combined areas need a symbiotic management plan that is ecologically compatible with suitable outdoor recreation. This may mean that ecologically sensitive areas may need to be free of motorized boats, snowmobiles, ATVs and generators as an example. It may also mean that sensitive areas may need to be free of outpost camps, lodges and private cottages.

All these areas, including the crown land that joins them, require a plan and strategy to protect, enhance and maintain the canoe routes and portages. Currently, there is only a very small amount of portage clearing taking place by Parks Ontario (crew of four in the second largest provincial Park) in Wabakimi Provincial Park. Very little if any takes place elsewhere by Parks Ontario. Currently, the bulk of the portage and campsite maintenance is performed by canoeists as they travel through these areas. This always makes canoeist question why they are paying park fees and what they are receiving in return from Parks Ontario.

The whole topic of road access and safe parking will need to be addressed in this park management plan. The number of visitors to the park is unknown. We do know that the number is much larger than what is in the background document. We also know that park users want more access options, and this must be addressed.

The number of backcountry canoeists purchasing permits to enter Wabakimi Provincial Park as an example has more than doubled and currently sits at well over 700 hundred canoeists as of 2020. This number is clearly climbing each year. Wabakimi has been found and discovered by the world. The number of canoeists, hunters and anglers is only going to increase with each passing year. The park management plan must address the large increase in visitors and prepare for the impact and stresses it creates.

What is very disturbing to canoeists is the lack of statistics gathered on the number of anglers and hunters entering the parks and the total nights in the parks as well as their impact on the resources of the parks. The entire revenue stream appears to be dependent upon canoeists. Parks Ontario has no real idea on the numbers of hunters and anglers entering the park on their own or

using outfitters and resorts to hunt and fish. They have no idea about the total nights, total anglers, total hunters, Canadians vs. Americans vs. Europeans etc.... They have no idea about the vast amounts of garbage being tossed behind the outpost camps, lodges and resorts, the abandoned boats, abandoned motors, number of fishing boats stored at boat catches, the large number of propane bottles and cooking grills and tables left on prime caribou calving islands by outfitters being used for shore lunches etc.... What is the impact on the fishery, what is the impact on the health of large mammals from hunting and trapping in the park? It does appear that the largest user impact group is not being tracked, monitored or studied and it is this very group that has the largest impact on the health and sustainability of the park. This is unacceptable and unreasonable to not have this data when developing a park management plan.

It should be noted that "Friends of Wabakimi" makes a notable contribution to these parks and does speak on behalf of canoeists with a paid membership of well over 330 members and a newsletter mailing list of 500 canoeists and growing. It is Friends of Wabakimi that promotes and markets these parks, creates and sells a park planning map, canoe route maps, canoe route guidebook, post canoe route reports and videos, provides webinars on the park, regular park updates, monthly newsletter, sits on Local Citizens Committees for surrounding Forestry Management Plans, raises money for park projects and always available to work collaboratively with Parks Ontario staff and MNR staff. As such, we would ask for the opportunity to be consulted during the park planning process.

Protected Area Pressures:

There are several areas like Elf Lake within the park that deserve to have special zoning, constraints placed on access due to their requirement for protection whether it be rare plants, caribou calving and nursery areas and culturally sensitive sites.

There are many other priority areas outside the current park boundaries that are equally important to the survival of large mammals like Woodland Caribou, Wolverines and the fisheries:

1) Rocky Road

- Boiling Sand values. Bad road/ Logging next to Wabakimi/ Year-round caribou habitat!
- Ecotourism Opportunity for Namaygoosisagun and Whitesand FN's

2a) D'alton and McKellar Rd

- Caribou calving on Caribou Lake/Hollingsworth L
- Critical and important Walleye spawning beds north end of Caribou Lake (Campbell Creek)
- Semi-remote tourism values
- MOST important access zone to Wabakimi for canoeists
- Lake Trout Caribou and Campbell Lakes
- Remote tourism outposts in D'alton Block
- Canoe routes
- Caribou migration routes
- Tourism opportunities for Whitesand First Nation (both ecotourism, as well as fishing and hunting trips)

2b) Big River

- Remote tourism outposts
- Canoe Routes
- Caribou migration route

3) Mischow-Albany Corridor

- Speckled trout
- Important canoe route linking Wabakimi to Upper Albany
- Superb whitewater route
- Ecological connectivity to Albany River

4) Sturgeon Lake - Savant River

- Speckled trout
- Access/buffer to west side of Wabakimi.
- Uncommon and unique wild rice stands
- Superb Canoe route(s)
- Ecotourism opportunities for New Saugeen and Mishkeegogaming FN's
- Caribou calving on Sturgeon Lake
- Remote fly-in tourism outposts

5) Brightsand River also needs enhanced and expanded protection, including caribou calving and year-round habitat at the southern limits of their range.

Recreational Carrying Capacity:

Very interesting topic as Wabakimi Provincial Park and Kopka River Provincial Park are getting busier with each passing season. Outfitters are now placing more canoeists on the same routes for costs efficiencies in trip/route planning, staffing and airplane/shuttle scheduling advantages. This is creating pressures like what the fly-in remote post, lodges and resorts create. There will be a need to establish carrying capacities on popular canoe routes, lakes and rivers for all users including anglers, hunters, outpost camps, lodges and resorts. A decision will need to be made on the carrying capacity of the land base to sustain use consistent with long-term resource protection with the utmost consideration for the social factors, such as solitude, relating to the quality of the visitor experience. This ultimately will result in the establishment of a carrying capacity number on visitors to an area, their length of stay and the types of activities to control the magnitude of human impacts. Other considerations to recreational carrying capacity include fisheries production, sensitive wildlife habitat and the protection of species at risk and cultural resources. Some areas have been identified as having significant caribou calving and nursery areas highlighting the significance of ecological considerations in the determination of recreational carrying capacities. These are measures that we support.

Access:

One method of addressing increasing visitation and crowding in some areas of the park is to create Access Zones or stated as more drive-in access points with parking for canoeists. Some pressure could also be relieved by developing a campground on both the east

side and west side of Wabakimi provincial park. Park visitor quotas in the popular areas may become a necessity in the future once capacity thresholds are determined. This would also apply to the remote outpost camps, lodges and resorts.

The issues surrounding VIA Rail need to be addressed as well as the safety of the drop off and pickup spots along with the availability of campsites and the safety and maintenance of the portages in these areas all need to be addressed when discussing VIAL Rail.

We do not support road access deep into the park to reach a destination lake like Whitewater Lake. Road access should be kept to accessing a waterway close to a park boundary where it can access the most canoe routes and relieve pressure from the most popular canoe routes.

The park management plan will need to identify and analyse the constraints and capabilities of the three parks based on carrying capacity, use patterns and access dispersal patterns. Zoning will be critical to the determination of carrying capacities and access points.

Park Classification:

IT would be beneficial to the long-term sustainability of Wabakimi Provincial Park to classify the entire park as a Wilderness Park or a Natural Environment Park or some combination of the two classifications with some areas receiving special protection zoning and/or restrictions. Kopka River and Whitesand provincial parks could remain classified as Waterway Parks. Friends of Wabakimi do hereby request a seat on the Wabakimi Park Boundary Committee.

Wildlife and Ecology:

We would support the creation of a scientific research centre to be established within Wabakimi Provincial Park or just outside of the park. Ultimately this could be attached to or relatively close to a Park Visitor Centre.

Parks Ontario is not attaching the necessary funding and staffing to these parks. Important research is necessary to conduct detailed inventory and studies on birds, amphibians, caribou, wolverines, moose, bear, reptiles, small mammals, forestry, fire, plants, flora, fauna, fish and fisheries studies and land management, vegetation management etc....

Visitor Services and Park Facility Development and Research Centre:

At present the park provides very little information to assist backcountry canoeist. It is "Friends of Wabakimi" that provide a trip planning map, route maps, canoe route guidebook, trip reports, videos, assist one-on-one guidance on canoe trip options with advisers, provides videos on trip planning, maps, trip safety and attends outdoor shows in Canada and the US to promote the parks.

It would be to the park's advantage to have a park presence with a visitor centre and science research facility to promote all the surrounding parks and reserves. There is an opportunity for the park to expand its boundaries to include Caribou Lake to add a visitor centre, research centre, campground with showers, staffing quarters, equipment storage and so forth. This would also provide local employment and supply opportunities as well as attracting more tourists to Armstrong and economic opportunities for entrepreneurs.

I wholeheartedly disagree with closing off areas like Cliff Lake to park visitors (canoeist) unless they hire (mandatory) indigenous guides to access Cliff Lake. This would not serve to protect pictographs and would not provide meaningful employment. The immediate danger to the pictographs is sunlight, wind, snow, rain, erosion and lake water levels. The immediate environment is what is wearing them away along with the effects of time. This would simply be perceived as a money grab and infuriate visitors. We would highly encourage indigenous people start businesses as canoeing outfitters and offer guided canoe trips with an indigenous menu plan along with an historical and cultural perspective to their services.

Yes, more park signage is necessary to inform people that they are entering a provincial park, and this is just what "Friends of Wabakimi" have done by funding two specially designed park signs.

Economic Development:

- * Yes, there is a need for several more maintained road access points with parking.
- * Yes, there is a strong need for far more portage and campsite clearing and maintenance.
- * First Nations have ample opportunities to purchase existing tourism opportunities as outpost camps, outfitters, aircraft and aircraft companies, lodges and resorts They are regularly up for sale.
- * We do not support an increase in development of outpost camps, lodges, resorts or private cottages.
- * We do not support an increase in hunting opportunities. The animals being hunted need our protection and not to make them captive sport.
- * The Beckwith site will never be a profitable venture to attract tourism. Restoring, rebuilding and maintaining a few cabins could easily eat up the entire park's annual budget each year. It is a great story and can easily be preserved at an interpretive centre within the visitor centre and signage could be placed on Best Island to tell the story. The island itself should be left for Caribou calving and as a caribou nursery.
- * Lodges, resorts, outpost camps should all be phased in to converting to solar panels and battery banks to eliminate generators and the gas and diesel contamination they are leaving behind at each site along with the unnecessary noise and air pollution. These operators should also be phased into to using electric motors for their fishing boats. There is a great opportunity for a local business to supply, install and maintain these systems.
- * If the park is unable to hire, train and supply annual portage and campsite crews then perhaps there is an opportunity for a private business to undertake this role.

Commercial Tourism:

There should be some thought to the future of tourism infrastructure in a wilderness park. At some point the question needs to be asked "should these businesses be eventually phased out when they become for sale and if so, along with the removal of the infrastructure." If they are to remain then we must ask if we can stop any further expansion or development.

Shore lunch sites on islands and along shorelines of sensitive caribou habitat and calving grounds must be removed and not permitted. They most certainly must NEVER be set aside for the exclusive use of outpost clients as these operators now tell canoeists. Many of these sites were previously campsites and cleared and maintained by canoeists.

It is highly suggested that remote tourism operators begin to maintain a high environmental standard and begin to transition to ecotourism.

VI. Comments by Beth Rausch, Friends of Wabakimi Board Member

General comments:

The breadth and depth of the document covering an area larger than the combined Superior-Quetico region is acknowledged. I am grateful for the opportunity to provide additional background information for consideration in the overall park plan, and I am especially grateful for the opportunity to paddle and fish on Canadian land as an American citizen. I do not take the privilege lightly or for granted. Thank you.

Twelve of the 78 cited references were from resources published in the past decade. This highlights the dearth of recent scientific activity and management in the park and its surrounding environs. It is important that management decisions be made with current science and best practices pertaining to wilderness management, recognizing the risk of practices formed from outdated references.

The report acknowledges a lack of data regarding reptile / amphibian spp. in the park. Additionally, there is strong concern among FOW membership that *more current data* is lacking regarding:

- caribou census
- breeding bird species at-risk
- moose / bear / fish harvests

- visitor (paddler and hunter/fisher) impact and lack of awareness / education regarding wilderness ethics and practices in the Wabakimi area and in the parks.

Additional background information for consideration:

1. Access:

Detriments to safe, sustainable canoe access in the parks include the following:

- Dearth of outfitters/shuttle service (there are three in the eastern region and none in the western region).
- Train access may be tenuous, unpredictable and dangerous. It is neither a reliable nor broadly accessible means of regular park access by canoeists.
- Lack of long-term vehicle parking space or safety.

High costs of access make these parks “bucket list destinations”. This does little to cultivate a sustainable industry for local First Nations or communities. Instead, the most profitable tourism (fly-in/fly-out sport fishing and hunting) is also the most elite and least sustainable activity in the long-term. This does not align with the wilderness designation of the park.

While managed activity is delayed, human activity in and around the wilderness parks is not. Clear-cut logging practices threaten the broader intact Wabakimi ecosystem. Unauthorized cabins have been built by the Whitewater Lake Community Development Corporation. Shore-lunch sites accumulate garbage and fish guts that attract bears. YouTube influencers produce their own sets of “Wabakimi paddling education” (including culturally insensitive approaches to pictographs, bushwhacking when a portage trail existed, poor fish handling, and chasing swimming caribou to obtain a closer view for the internet audience).

The development of formal or authorized paths of education regarding visitor activity in the park would fill a current void. As noted, many outpost visitors have no awareness that the outpost resides in a world-class wilderness paddling destination. Similarly, paddlers visiting the park are not receiving instruction in best-practices within the wilderness parks.

2. Local Community, First Nations engagement:

Local communities express lack of gain from park existence and activity. Incentivizing opportunity through year-round employment may mitigate some of the problematic nature of seasonal positions. The park’s size would accommodate the development of additional outfitting services, including accommodations (food and lodging), gear rental, route planning and shuttle service.

3. Nurture and leverage evolving relations with volunteer organizations whose vision aligns with a sustainable wilderness park: Friends of Wabakimi

Leveraging volunteer resources such as that which exists with FOW may help ease the burden of park operational costs, the sense of overwhelm with respect to management and maintenance, and the lack of bandwidth on park personnel to be “everything to everyone”. Citizen science, portage maintenance, visitor education, historical and archival activity, and staff-tourist liaisons are elemental ideas for consideration.

VI. Questions for consideration submitted by MJ Blaisdell, FOW Board Member

10.3.1

Local communities have derived very limited economic benefit from Wabakimi/Kopka parks to date, although expectations were advanced at the time of the Wabakimi Park expansion. Land disposition in some areas adjacent to Armstrong was deferred pending completion of the park management plan. Several communities have expressed interest in hosting park developments.

Has the park considered the incentivization for community people to develop outfitter businesses and/or other recreation-related businesses (lodging/food establishments)?

10.3.2

The future of in-park roads must be determined. Additionally, the plan should recommend management direction for roads adjacent to the parks.

Has a road use permit been considered instead of a no-use policy as a compromise between request for use, overuse possibilities and protected use?

As use increases, parking may become congested at some access points. There are also security and economic issues associated with parking and shuttle service availabilities.

While there may be issues associated with this, perhaps a need for shuttle service brings economic opportunities as well? What could be done to incentivize potential business opportunities for this?

Water taxi services may provide an opportunity to enhance visitor distribution and safety, particularly on large lakes adjacent to the parks (e.g., Caribou Lake).

This may be another economic opportunity for developing businesses for local communities.

Continued and future park access using VIA Rail is an unknown. The current service restricts the number of canoes transported. A comprehensive approach to park access must consider rail, road, air, and water access.

Has the park considered establishing an agreement with the Rail line to ensure this service continues?

10.3.4

Detailed inventory work or long-term monitoring has been conducted for birds, amphibians, and caribou but not for reptiles or small mammals. The lack of information makes management difficult.

Has the park considered enlisting park visitors as citizen researchers who provide such information or enlisting the help of other entities such as Friends of Wabakimi to officially monitor these animals as a part of trips taken to the area?

Caribou are subject to human disturbance, particularly during calving periods.

Campsites and shore lunch sites are often located at or near sites used by

caribou. There may be a need to separate (increasing) human and caribou activities. The occasional presence of dogs accompanying park visitors further compounds this concern. Aircraft and motorboat restrictions may be required. Visitor education enabling the identification of caribou signs are vital to their protection.

Has the committee considered visitor education through a video required at the time of permit purchase? Enlisting the help in the creation of such videos by college level forestry training programs and/or communications programs may accomplish this easily and cheaply.

10.3.8

As canoeist visitation to the parks increases, visitor management strategies used in other backcountry parks (e.g. Quetico, Killarney, and Algonquin) may be necessary to protect park resources and to provide a quality visitor experience. Examples of strategies include:

Entry quotas, dispersal, and reservation systems. The many means and points to access these parks provides a challenge for management. Currently, reservations are unavailable, and quotas do not apply.

Reasonable strategies. Has the park considered the further development of existing road access areas as a means of greater dispersal of recreational use individuals?

Restrictions on the use of glass or metal containers by backcountry campers.

This has been shown to reduce litter in other parks.

Implement campsite designations. The use of designated campsite signage may be seen to intrude on the visitor experience.

Party size restrictions can reduce environmental impacts and potential negative impacts on the experiences of other visitors.

These last 3 strategies seem reasonable.

10.3.9

Backcountry visitors will expect a signage standard to be in place throughout the park. Direction is needed regarding the signage of campsites, portages, and hazards.

This is a good idea for maps. Has the park considered the use of maps developed by other entities such as Friends of Wabakimi? Backcountry visitors will not expect signage other than on maps. However, signs posted at entry points and park boundaries would be helpful.

Many guests of the remote tourism industry have no idea that they are within a provincial park. There is a need to increase awareness of this and the associated park regulations.

This could easily be included in the aforementioned visitor video education idea.

Some area community residents have expressed concern that many park visitors never visit or provide economic benefit to their towns, as their trip starts and ends at a remote outfitter location.

Has the park discussed how they could incentivize towns to pursue community economic benefit through lodging/restaurant provisions?

10.3.10

Camping permits are currently sold by outfitters⁶ who benefit by attracting clientele. Their locations are dispersed; they have long, convenient operating hours and provide this service in a cost-efficient manner. On the other hand, there may be a need for a central (park office) location where visitors can locate park staff and from which customer service could be provided, permits and park merchandise sold, visitor use can be managed, emergency information accessed, etc.

Perhaps a joint effort using a mutually accessible data base for purchasing such permits could be shared between outfitters and park office, allowing for visitor choice as well?