

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

Date: January 10, 2022

Dear Mr. Cameron,

Friends of Wabakimi

As you know, I represent the Friends of Wabakimi (FOW) on the Wabadowgang Noopming Forest LCC. I follow the meetings and attend, when possible. 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 key parts of the WNF in CLUPA #2616 near Wabakimi is an important value to be preserved. FOW’s priorities and concerns fall under the following topics:

- 1) Ecological integrity and sustainability
- 2) Maintaining a healthy and sustainable woodland caribou population
- 3) Protect lakes that support Lake Trout
- 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

Crown Land Use Policy Atlas (CLUPA)

All of the above priorities are especially important within the Provincial Crown Land Use Policy Atlas (CLUPA) 2616. CLUPA provides the land use planning for the entire province and it implemented the important province-wide Lands for Life/Ontario’s Living Legacy process in the 1990’s. We understand that forest management and logging are allowed in CLUPA 2616. However, the above values take priority over forestry management activities. These values must take priority if there are conflicts that cannot be resolved through compromise.

Park Management Plan

After 38 years there is still no Park Management Plan to define the future direction of the park. However, the interim management strategy does maintain the status quo for many things, including outposts and access. We believe that should prevent creating any new access or the enhancement of present access.

The Boiling Sands River is ecologically sensitive and cannot withstand a high volume of canoe traffic. An upgraded Trail Lake Road could provide unlimited access to this sensitive river. Thus, the status of the terminus of the Trail Lake Road should not be changed until that Park Plan is completed. Maintaining access to the Boiling Sands River should be as low grade as possible to prevent overuse.

Suggestions for Protection and Management

Wabakimi Park is large and protects many important ecological and landscape features. However, there were some relatively small, but critically important areas that were not included within the park. We urge that these areas be granted special status and be protected from forest harvesting and roads. They should be considered for addition to the park, or alternatively be given Provincial protected status. Several are within CLUPA 2616.

We suggest that the following sensitive areas within CLUPA 2616 be considered for protection as Conservation Reserves to protect woodland caribou and other wildlife values:

- **Caribou Lake** (the northern half). The northern shore, with its dozens of islands, has been documented as critical calving habitat and an east-west migration corridor. Caribou need to be protected from adverse influences that will reduce their movement and their calving success. These impacts include roads, adjacent logging and excessive recreational use in May and June. These impacts could be well achieved through status as a Conservation Reserve, with appropriate management prescriptions under the Public Lands Act. Aside from concerns about affecting caribou calving, the northern half of Caribou Lake has a relatively high intensive use recreational capability. It acts as a “filter/buffer” to reduce overuse of the more sensitive sites inside the park.
- **Caribou – Campbell - Hollingsworth Triangle** – This area is bounded by the park on the west and lies north of Caribou Lake and south of Campbell and Hollingsworth Lake including Campbell Creek, which is an important walleye spawning area. Campbell Lake is a valuable and remote lake trout lake. Hollingsworth Lake has been well documented by MNR as critical caribou calving area, historically and presently.
- **The “D’Alton Block”** – This area includes most of the Big River drainage stretching from Linklater Lake on the north, to Lower Pawshowconk on the east, the Big Lake to the south and northeastern arm of Caribou Lake. The D’Alton Block would include D’Alton, Reef, Moonshine, Cosmo, Amra, Mitchell, Cumaway, Rhodes, Ruxton, Pawshowconk and the Linklater Creek chain. It also includes all the Big River as far east as the McKinley Road.

The D’Alton Block has an unusual high concentration of interconnected small lakes and rivers. It has been documented as historical caribou habitat and migration corridors. There are several valuable remote tourism outposts scattered across the “block”. This tangle of lakes has the potential to be enhanced for recreational canoeing and creates opportunities for canoe outfitting for the Whitesands community.

Currently, canoeing access to the D’Alton Block is limited to portaging in from Caribou Lake. If the existing Big Lake Road were opened to recreational use up to the stream crossing just south of Big Lake, another route would be available to paddlers. This limited access would still maintain the wilderness character of the outpost cabins. It would also help reduce canoeing pressure on caribou calving on Caribou Lake in May and June.

- **Doe-Fawn Lake Complex** – This area is located north and northeast of Collins. It is bounded on the south by the CNR Line, on the west and north by Wabakimi Park and on the east by Fawn and Doe Lakes. This area features shallow soils and is important currently used year-round caribou habitat. This

small but important area deserves status as a Conservation Reserve to protect this caribou habitat. Eliminating or limiting road access and designating the area west of Doe and Fawn Lakes as a Conservation Reserve will accomplish both of these goals.

In the meantime, harvesting and new roads west of Fawn/Doe should be deferred for at least 10 years. That suspension will also provide a buffer for the tiny, sensitive Boiling Sands River watershed. The Boiling Sand River is an incredibly beautiful canoe route. However, because of the thin soils and small size it cannot withstand overuse by canoeists as a result of enhanced road access. The Boiling Sands River must be managed to be sustainable for both canoeists and caribou. Limiting road access and designating the Doe-Fawn Lake Complex a Conservation Reserve will accomplish both of these goals.

Gnome Lake is a valuable lake trout lake at the headwaters of the Boiling Sands River watershed. This lake is easily accessed from Tamarack Lake, and deserves special attention and protection from roads, logging and undue fishing pressure.

Roads inside of CLUPA 2616.

We are recommending some areas within CLUPA 2616 for Conservation Reserve status. That designation lies outside of the scope of the FMP. However, it does lie within the responsibilities of the MNRF, and this is a Crown FMU. **The CFSA (Crown Forest Sustainability Act) makes it clear that the Minister shall not sign any FMP that is not sustainable for all forest values.** So, this draft FMP can, and should:

- 1) Defer roads and harvesting wherever possible within those areas recommended for Conservation Reserve status.
- 2) Wherever possible, any harvesting within these sensitive, valuable, and contentious areas should utilize access that is:
 - *As temporary as possible
 - *Winter roads/harvesting where possible
 - *As short-term harvest as is feasible, preferably in winter.
 - *Fully decommissioned and revegetated to remove linear features
- 3) Of particular importance for lowest possible grade, temporary (perhaps winter) roads are:
 - *Kellar Road, and any proposed road near the north end of Caribou Lake.
 - *Roads in or near the D'Alton Block
 - *Roads near Hollingsworth or Campbell Lake
 - *The Trail Lake Road anywhere west of Fawn/Doe Lakes.

These roads should be winter roads... or left just in the current state to keep open the possibility of increased formal protection of the caribou habitat and remote recreational experience.

We do understand the need for economic benefit to Whitesand First Nation, and Armstrong. We believe that the above recommendations are consistent with long term sustainability for both the natural environment and local economy. We would be happy to continue to share our views and concerns with the LCC and Planning Team. The area in and around Wabakimi Park, and within CLUPA 2616 is of world class importance, and merits unusually special considerations and management.

Respectfully,



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