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642 King Street West, Suite 216
Toronto, Ontario
Canada M5V 1M7
Tel: (416) 941-9388
Fax: (416) 941-9236
Email: office@queticofoundation.org
Web Site: www.queticofoundation.org
Charitable Registration
No. 119252427RR0001

November 28, 2013

Ms. Jennifer Lukacic
Acting Superintendent
Quetico Provincial Park
108 Saturn Avenue
Atikokan, Ontario P0T 1C0

Dear Ms. Lukacic:

Re: Preliminary Park Management Plan - Quetico Provincial Park
EBR PB06 E2023

We are writing in response to the release of the Preliminary Park Management Plan-Quetico Park on September 30, 2013. Our comments are being submitted in keeping with the November 29, 2013 deadline for comments following the 60 day review period specified in the notice of release.

The Board of Trustees of The Quetico Foundation has reviewed the Preliminary Park Management Plan in detail. We have reviewed the document within the context of our earlier submissions to the 'Background Information Document' in November 2007 and the "Management Options" document in October 2010, within the context of current day issues and threats to the Park, and also with an outlook to ensuring the future wilderness integrity of the Park and the status of the Park as a world class wilderness resource.

The review of the Quetico Park Management Plan has been a long process spanning seven years. We have welcomed the opportunity to be actively engaged in the process throughout, in order to help shape and guide the direction of the Park for decades to come. The way in which the Park is protected and managed is at the heart of the Foundation's raison d'être.

The Preliminary Plan is comprehensive and addresses most of the complex array of management considerations and issues that are inherent to wilderness parks in general and Quetico Park specifically. We have noted that many of our earlier comments and concerns as articulated during the earlier stages of the public process were also shared by other respondents. We appreciate that these concerns were taken into serious consideration by the Ministry and many have been reflected and incorporated into the Preliminary Plan. In our view this reinforces the value of active public engagement in delivering a more comprehensive, balanced, and better product.

We would like to reinforce some of our earlier concerns and offer a number of observations of a more general nature in regards to how certain matters are captured within the Preliminary Plan, where the Plan differs from positions we have previously

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expressed, and where we feel the Plan could be strengthened. We will follow with detailed comments referencing specific paragraphs or statements in the Preliminary Management Plan.

General Observations

Ecosystem Approach to Park Management

The Foundation is encouraged by the recognition of the value in adopting an ecosystem approach to Ontario Park management and suggests that this approach has far reaching benefits. The Preliminary Plan states; “*Ontario Parks is committed to an ecosystem approach to park planning and management. This approach allows park managers to consider the relationship between the park and the surrounding environment. Park managers may consider potential impacts on park values and features from activities occurring on adjacent lands and potential impacts from park activities on land uses in adjacent areas.*” We do note, however, that this statement has been weakened from that presented in the 2010 Management Options document, and recommend reinstatement of the original wording.

The document also identifies many of the surrounding areas to the Park as being ‘General Use Areas’ under *Ontario’s Living Legacy Land Use Strategy*. These General Use Areas permit a full range of resource and recreational uses, and the management of these areas is to occur within the context of ecological sustainability. The Preliminary Plan speaks to a role for Ontario Parks staff in reviewing development proposals on these lands and indicates that wilderness integrity will be one of the criteria against which any such proposals shall be reviewed. However the Plan appears to fall short of defining the mechanics of the process that would enable Quetico Park staff to have decisive influence over the activities of these surrounding areas, and the importance of paramount priority being given to ensuring the protection of the wilderness of Quetico. As stated in our submission in 2007 to the Background Information document; “*All management decisions in or near the Park must ensure (a) the maintenance of ecological integrity (the top priority of park management according to the new Provincial Parks and Conservation Reserves Act), and (b) the preservation of the Park’s wilderness character.*”

We also suggest that the Plan would be strengthened by inclusion of a proactive ecosystem management approach, rather than being reactive to specific development proposals. The Plan speaks to an active watershed based management approach to the Quetico watershed under the Crown Land Use Policy Atlas Policy Report G2624: Hinterland, and a broader fisheries management approach under the Zone 5 Fisheries Management Plan. However there appears to be no reference to a proactive ecosystem based approach to vegetation and wildlife management and research.

The Quetico Foundation has suggested in earlier submissions our preference for a ‘zone of cooperation’ surrounding the Park with a shared management structure. *Ontario’s Living Legacy Land Use Strategy* provides a number of alternative land use designations that would appear to provide for land uses more compatible with a wilderness park and likely more amenable to a cooperative approach to management of buffer or transition zones. The Foundation feels that the new Management Plan for Quetico presents an ideal opportunity for Ontario Parks to begin to set a new

framework and standard for wilderness protection under the PPCRA, that would be more in keeping with many other jurisdictions worldwide.

Namakan River Hydro Development Project

Of extreme importance within the context of the Park and its surrounding environment is the proposed hydro development project at High Falls on the Namakan River. Although High Falls is outside the Park boundary, the alleged proposal for hydro development on the Namakan River presents, as we articulated in our response to the Options Paper, *“one of the most serious threats to the Quetico area wilderness, the Park and the threatened Lake Sturgeon population that we have ever encountered.”* Our concerns in regards to this project and its threat to the integrity of the wilderness and heritage of Quetico, and in regards to the specific proposal at the time, are fully documented in our comments in 2010 to the Draft Environmental Report for the Namakan River High Falls Project.

Our concerns pertaining to this project have not abated. The Foundation, as well as the MNR was verbally advised by the proponent in March of 2013 that the project had been cancelled, and we were surprised to learn more recently that efforts are underway to resurrect the project. We are also surprised to note that the Preliminary Management Plan states, *“In 2012, OPEG with Gemini Power Corp. re-initiated the EA process for one of the original hydroelectric projects at High Falls with a new design intended to prevent impacts to Quetico Park water levels.”* Our understanding has been that there has been no formal proposal for a dam at High Falls since the proposal was first presented to the public at the end of 2009.

The Namakan River and any proposed hydro development activity on the River warrants a full discussion in the Park Management Plan in relationship to each of the Park’s four objectives, and as noted earlier, the mechanics associated with the Park staff’s ability to ensure the protection of the wilderness and heritage integrity of the Park, for a site and proposed development outside of the Park’s boundary. The Foundation is not alone in its concern. The Namakan River hydro development project was highlighted by many respondents to the 2010 Management Options document as a key area of concern and a matter requiring full discussion in the Management Plan.

Invasive Species

An ecosystem based approach should also encompass invasive species management. The Plan’s attention to invasive species is limited and would benefit from a more substantive policy for the proactive prevention, management, and control of existing and potential exotic invasive species, reflecting an ecosystem based approach.

Mining Claim Activity

In previous submissions, the Foundation highlighted concerns regarding the potential for heavy metals and other pollutants to enter the Park from mining claim activity on the Park’s eastern boundary. The Plan should address this threat and the proposed management approach. Again, an ecosystem based approach to Park management within a ‘zone of cooperation’ model would help to address this concern.

New Wilderness Zone (W3)

The Preliminary Management Plan introduces a new Wilderness Zone (W3) into the Park Management system to “*facilitate the provision of land-based non-mechanized wilderness activities close to the Dawson Trail Campground in order to introduce wilderness travel and camping to campground users.*”

As articulated in previous submissions, The Quetico Foundation believes that the introduction of such a zone sets a dangerous precedent for the future of wilderness parks and the wilderness experience, and that new categories of wilderness zoning that are inconsistent with the integrity of wilderness objectives are not appropriate.

We note that the acceptable activities for this proposed zone are generally in keeping with wilderness objectives, and exclude some of the conflicted activities previously suggested, such as commercial dog sledding and mountain biking. However the recreational activities proposed are exceptions to the uses normally found in wilderness parks and are only a consideration due to the existence of the Dawson Trail Campground, which has an Access Zone designation. Ideally these activities should be directed to areas that might be included in a ‘zone of cooperation’ along the perimeter of the Park boundary. At minimum, these activities should be provided for through existing zoning provisions or be identified as a non conforming use, and not be accommodated through the introduction of a new wilderness zone, that is inconsistent with wilderness objectives and which could at a later date permit other types of incompatible activities.

Lac La Croix

The discussion of Lac La Croix and the Agreement of Coexistence (AOC) in the Plan is insufficient in our view. The relationship of the Lac La Croix First Nation with the Park is regarded as sacrosanct, and needs to be clearly recognized. It is well understood that the Agreement of Coexistence terminates at the end of 2015, and options are currently under consideration. A discussion in the Plan acknowledging the end date and uncertainty of the AOC going forward, outlining the process for reassessment, reinforcing the position of the LLCFN within the Quetico Park context, and defining associated guiding principles that are in keeping with the Park’s wilderness values, would be appropriate. A mechanism for consultation with other stakeholders should also be incorporated into this process. Any new agreement with the LLCFN should provide for activity consistent with regulations and policies that apply to all Park users, except in relation to Treaty rights. .

Implementation, Monitoring, Enforcement and Adjustment

A Plan is only valuable if the proponent organization has the ability to implement it, enforce it, and measure whether it delivered on its objectives. All that is contemplated in the Management Plan is for naught, if the resources to deliver the Plan, manage the resources, ensure enforcement of the regulations and policies, and monitor the outcomes, are absent. The Plan could be strengthened considerably with a commitment to deliver on the Plan and a discussion of how the effectiveness of the policies will be assessed on an ongoing basis. This will provide critical feedback to subsequent reviews of the Plan. Inclusion of enforcement policies and associated operational strategies would also be useful.

The notion that the Plan would only be examined after a 20 year period seems counter intuitive and contrary to the indication that “*the Plan can be replaced or adjusted to address changing issues or conditions*”. In our view, the Plan should be a living document that is under informal review continually, with a more frequent periodic formal refresh involving stakeholder input. A mechanism to enable this should be developed and included in the Plan.

Specific Comments

Pg 12 – Birds – There does not seem to be any reference to whip-poor-will in this section, although it is thought to be in the Park and is a designated species under Ontario’s Endangered Species Act (ESA).

Pg 15 - Cultural Features – It is understood that there are many historical representations of First Nations, such as pictographs, in the Park, that have spiritual significance to First Nations communities. There does not appear to be any discussion in the document regarding these sacred artefacts and their protection.

Pg 15 - Outdoor Recreation – The broad objective for outdoor recreation, that reflects the overall Ontario Parks’ recreation objective should be included.

Pg 15 - Second Paragraph – The numbers reflecting entry point data need clarity. They are confusing and don’t add up the way they are presented. Would 2012 data now be available, and is there trend data that could be included to provide a more meaningful longer term context?

Pg 31 - Adjacent Land Management – With reference to earlier comments regarding an Ecosystem Approach, this section should be strengthened. In addition the discussion regarding the Namakan hydro development project warrants considerable additional discussion. The reference to the Atikokan coal fired generating station may warrant updating.

Pg 33 - Vegetation Management – Greater discussion of policies regarding management of invasive species is warranted in this section. The reference to non-native plant species specifies that such species “*will not be deliberately introduced to the park,*” and further suggests monitoring and control of infestations. An effective active management strategy should include prevention and education.

Pg 33 - Third Paragraph – Mechanized tending of the Hydro One corridor in the W1 zone should not be permitted. Tending should be by hand in W1. In addition, the Plan should reflect a commitment on the part of Park staff to uphold the values of a wilderness park while undertaking their responsibilities whenever possible, and keep the use of mechanized tools and means of transportation to a minimum.

Pg 35 - Water Management – The Plan suggests that the Park will maintain the Pickerel Lake dam and replace it if necessary with a spillway or weir. Clarity between this intent and the statement in the same section, “*Water levels within Quetico will not be controlled by dams located in the park,*” should be provided. The Quetico Foundation suggested in its response to the Management Options document, that a full study of the implications of various options regarding the Pickerel Lake dam should be

undertaken prior to a decision being made regarding its future. We note that many other respondents favoured removing the dam. We suggest that the decision to retain the dam continues to be premature.

Pg 37 - Wildlife Management – It should be clarified that the traplines in Quetico are used for commercial purposes. Also the number of traplines referenced in this section doesn't add up to the total registered. It should also be clarified that access provisions extend to both First Nations registered trappers and non First Nations trappers. It might also be helpful to clarify the underlying premise for the existence of registered traplines in the Park and the relationship, if any, to the Agreement of Coexistence.

In addition greater discussion regarding policies pertaining to management of invasive species is warranted in this section.

Pg 40 - Canadian Heritage Rivers System – It is noted that this section references a proposal to amend the existing designated Canadian Heritage Rivers route along the Park - US boundary, to recognize the early fur trade route from Fort William through Quetico, which will be submitted to Heritage Canada in 2013. Perhaps this should be updated given that 2013 is almost over. Discussion of the historical importance of the Namakan River within this context would be useful.

Pg 42 - Dawson Trail Campground – This section indicates that a number of new campground sites may be created to accommodate small and medium sized RVs (under 32 feet). We are assuming that this means that RVs over 32 feet will not be accommodated at the Campground, as recommended in our response to the Management Options document. The Plan should stipulate this restriction.

Pg 43 - Visitor Regulation Program – This section states that large groups should be 'encouraged' to camp separately. This should be changed to 'are required' to camp separately in keeping with campsite occupancy limits.

The Plan should include reference to open fire bans during times of extreme fire hazard.

Pg 45 - Trails – In regards to the Trans Canada Trail, the Plan should clarify that use of the Trans Canada Trail will comply with all Park regulations and policies.

Pg 49 - Natural Heritage Education – An important component of NHE is archaeological activity and discoveries in the Park. It is suggested that greater discussion of this element be included in this section of the Plan.

There should also be reference in the Plan to the Artist in Residence Program, the Artists Studio and the associated educational programming affiliated with that Program. Recognition of the Foundation in regards to the studio and our ongoing involvement with the Program should also be referenced. This is an important ongoing program of the Foundation that we wish to ensure is retained in the longer term.

It is also suggested that there be greater discussion of the value of the John B. Ridley Research Library. This is a unique resource in the Parks system that makes a significant contribution to the NHE program and has achieved considerable recognition in other jurisdictions.

Pg 57 - Friends of Quetico Park – The section in the Preliminary Plan on the ‘Friends of Quetico Park’ should provide greater clarity regarding the connection between the ‘Friends and the Park’ in terms of limits on their independence. The distinction between the ‘Friends of Quetico’ and ‘The Quetico Foundation’ is premised largely on ‘independence’ and tends to be an ongoing area of confusion.

Appendix C - The use of the histograms in this section is somewhat misleading, in that the same weight is given to an organization that may represent thousands of members, as is given to an individual. The influence of the results of these histograms on the decisions taken in regards to the Management Options is also not clearly aligned.

Editing - A careful proof reading of the Preliminary Plan would be useful, including consistency and accuracy of references, use and definition of acronyms, consistency in formatting and type, and grammar. Please be reminded of the spelling of ‘The Quetico Foundation’.

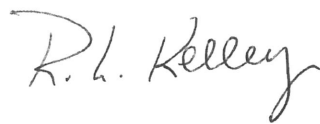
We have attached our submissions in response to the Quetico Background Information document in 2007, and our response to the Management Options document in 2010, for your ease of reference.

The Quetico Foundation feels that all of these issues are important considerations in ensuring the development of a Management Plan that will serve the best interests of the Park for decades to come and will protect the integrity of the wilderness values of the Park for future generations.

We believe that the Management Plan review presents an opportune time to closely examine the true values and objectives of the Park and ensure that the Park’s management strategies and practices reflect and support those values. We trust that our participation in the process will also help to ensure the preservation and recognition of the Park within the global context of the Canadian wilderness.

We would welcome the occasion to discuss our concerns in greater detail and thank you for the opportunity to be part of this important initiative.

Yours truly,



Richard L. Kelley
Chair

Attachments: 1. Quetico Foundation Response to QP Background Information
Document - Nov 2007
2. Quetico Foundation Response to QP Management Options
Document EBR PB06E2023 - Oct 2010

cc David O’Toole, Deputy Minister
Bradley Fauteux, Managing Director, Ontario Parks