

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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January 22, 2015

Ms. Carla Riche, District Planner
Ministry of Natural Resources and Forestry
Wawa District
48 Mission Road - 101 Highway
P.O. Box 1160
Wawa, Ontario
POS 1K0

Dear Ms. Riche:

Subject: EBR # PB06E2025 - Land Use Planning For All Provincial Unregulated Crown Lands and Waters in Wawa District

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, subscribers and supporters, and 725 member clubs, we have reviewed the Wawa District's Crown Land Use Atlas Harmonization Project Management Guidelines. The following discusses some of the concerns we have with the document/project. Some of the proposals we may support with more information; however, we recommend that this project remain in stage four of the review process until the document is updated and all stakeholders are properly informed/consulted.

In addition to this letter, the OFAH submitted a brief overview of our comments for the public record on the EBR. The OFAH had requested an extension for our comment submission, due to the identification of important support documentation (not directly indicated in the registry posting) late in the comment period, but we did not receive a direct response from the district office. As a major stakeholder and member of the steering committee for the Crown Land Use Atlas Harmonization Project (CLUAH), we felt that the comment period was insufficient for the public to provide informed comments. Even as an active participant in CLUAH for the past eight years, we found the proposals and supporting information to be challenging to effectively interpret. Despite being a member of the steering committee, we have not been adequately consulted with, or even informed on the progress or plans, especially during the past two-and-a-half years. The implications of this project are not only significant to our members who fish, hunt, and recreate in the Wawa area, but also throughout the province.

The following are some of our concerns with the proposals in the Wawa District's Crown Land Use Atlas Harmonization Project Management Guidelines.

Land Use Designations

The OFAH notes that this section (3.1) of the management guidelines provided brief and vague definitions of the various land use designations. It does not provide "guidance and managerial direction" as stated in section 3.0. The OFAH notes that there is more information provided in section 3.4 for recreation areas; however, this is not referenced in section 3.1.2, making it difficult for the public to make the connection and locate the appropriate information.

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General Use Areas

The OFAH notes that there are two pages of information presented on the Agawa Bay recreational fishing area, Lake Superior general use area, Lake Superior coastline, and Lake Superior sport fishing area, all of which will not be changed from their original delineation and description in this project. However, the introduction and significant revisions required for amalgamating numerous general land use areas to create two new and unified Multiple Resource Management Areas (east and west) is provided by a four-sentence description and a reference to appendix three, which only speaks to the management of designated Enhanced Management Areas (not Multiple Resource Management Areas). The OFAH finds the description of General Use Areas (especially section 3.2.5) insufficient and without any reference to “guidance and managerial direction,” which is the primary purpose of section 3.0. The OFAH would also like to see a better description of the difference between enhanced recreation management areas and a multiple resource management area. It is difficult to determine if we support this type of delineation if we are unaware of the management intent for each area.

Designated Tourism and Recreation Values

The following outlines some the concerns the OFAH has with the current Ministry of Natural Resources and Forestry (MNRF) direction (or lack thereof) for remote tourism within the CLUAH area. The OFAH expressed a number of these same concerns during the last stakeholder comment period (September 2011).

- **Buffers:** The OFAH is encouraged to see the proposed reduction of buffer size around tourism lakes by one kilometre for both main lodges (two kilometres) and outpost camps (one kilometre). However, the OFAH believes that these operational prescriptions are still overly restrictive for what is needed to protect remote tourism values. Specifically, the OFAH believes that the Tourism Strategy provision for access restrictions is unnecessarily restrictive and is a major contributing factor to conflict within the Wawa District.
- **Moose Hunt:** The OFAH notes that currently during the first two weeks of the moose hunt, access is restricted on roads around most tourism lakes. The OFAH may support the proposal of a pilot project for the “reduction to one week of the hunt or an elimination of the closure all together” in section 3.3.1 of the management guidelines, depending on the specific details of the pilot. The restriction of public moose hunting opportunities throughout the first two weeks provides an unfair “first chance” or quality advantage to a single resource user group. Eliminating this restriction will provide the public with more high quality moose hunting opportunities that is more equitable than the current conditions.
- **Opportunity Lakes:** The OFAH was surprised that there was no mention of the opportunity lakes in section 3.3 or in the entire main document. The only mention of opportunity lakes is in the table of contents and in section 6.2 of Appendix 2. We also noticed that opportunity lakes are included in the legend for the “Option A Map” provided in the EBR posting; however, only a few of the 49 opportunity lakes are included in the map. The OFAH questions how the public is expected to be aware of and provide comments on this significant proposal if they cannot see it on the map provided, and are not told about it in the text of the document? The OFAH suggests that the MNRF did not provide sufficient resources for the public and stakeholders to provide meaningful comments on this proposal. The OFAH would support the proposed return of 49 lakes to public use that were previously designated as remote tourism lakes.

The OFAH also noticed the proposal to evaluate inactive designated tourism lakes on a case-by-case basis in the table in section 2.2.3 (on page 28).

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The OFAH would support establishing screening criteria to determine whether or not current remote tourism lakes are in fact “remote,” and/or if it is actively being used for tourism. Any lakes with outdated land use permits or that have not been used in recent years, should be considered for opportunity lakes. Any lakes that do not currently meet the definition of “remote,” should be re-designated.

- **Messaging:** Inconsistent wording and inadequate sign placement often results in confusion about the permitted and prohibited uses on a road or road system. In many cases, this can be a significant source of the conflict between resource user groups. A good example of this is the recent proposal to erect a number of signs stating “Unauthorized motorized vehicular travel prohibited beyond this point” in Magpie Forest. We feel that the wording of these proposed signs is both overly restrictive and inconsistent with the signs already present within the forest. If valid motorized access restrictions are required they should incorporate clear and consistent messaging throughout the entire district. Signs should read:

“The use of motorized vehicles for the purpose of (accessing lakes x, y, z; moose hunting; etc.) from (start date) to (finish date) beyond this point for (x) km is prohibited.”

- **Access:** For those primary or secondary roads (or road systems) that extend beyond a tourism buffer, access to the remaining length of the road by motorized vehicles should not be restricted. Therefore, signs should be posted on the road at the entry and exit access points of the buffer to make users aware of the permitted and/or prohibited uses. The entrance sign should read as recommended above (see messaging).
- **Timing:** There should be no motorized access restrictions (for the purposes of protecting remote tourism values) that extend beyond the peak (summer) tourism operating season (i.e. June 1 – August 31). Motorized access restrictions to protect remote tourism values during the “off-season” are unnecessary. The existing suite of fisheries regulations provide sufficient protection for tourism values during the non-operational season. There is no empirical rationale to suggest that the existing hunting and fishing regulations jeopardize remote tourism values. In other words, motorized access restrictions should not be used as a substitute for sound wildlife or fisheries management.
- **Barriers:** Physical barriers (e.g. gates) should not be used to restrict motorized access on primary or secondary roads for the purpose of protecting remote tourism values. The use of physical barriers unnecessarily restricts all Crown land resource users. For example, if a forest access road is gated to restrict individuals from a particular activity (e.g. accessing specific lakes), then all users (e.g. mushroom/berry pickers, grouse hunters, etc.) are denied access. This type of access restriction is overly excessive to achieve the desired goal.

Conclusion

The OFAH has long-recognized the need for better recreational land use planning for Ontario’s Crown land. Therefore, the OFAH fully supports the use of recreational land use planning to help reduce the high degree of conflict that currently occurs in the Wawa District. Although the OFAH believes that the CLUAH project has considerable potential to prevent resource user conflicts, we caution the MNRF from endorsing a management option that will eventually polarize resource users even further. We agree with the MNRF’s objective to make land use policies more clear and consistent; however, we do not believe that the proposed approach effectively and successfully addresses the root causes of conflicts between Crown land user groups. Combine these concerns with the extremely limited public and stakeholder consultation, poor timing of the posting (holiday season), and incomplete information provided, the OFAH cannot support this project moving forward from Stage 4. The current land use management approach in the Wawa District is clearly not working and needs to be changed.

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We have highlighted some of the positive steps presented in the most recent proposal (e.g. opportunity lakes, etc.); however, the Wawa District's Crown Land Use Atlas Harmonization Project Management Guidelines, as written, will not provide the necessary management direction and rationale needed to resolve the current conflicts related to land use management. The OFAH recommends that another round of public and stakeholder review and comment occur. This consultation must include complete information that clearly describes what is being proposed.

The OFAH would be happy to meet with MNRF staff to discuss our comments and recommendations further, and answer any questions you may have.

Yours in Conservation,



Chris Godwin
Land Use Specialist

CG/gh

cc: OFAH Board of Directors
OFAH Land Use/Access/Trails Advisory Committee
Angelo Lombardo, OFAH Executive Director
Greg Farrant, OFAH Manager, Government Affairs & Policy
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