Ms. Allison Dennis, Park Superintendent
Ministry of Natural Resources and Forestry
Regional Operations Division
Northwest Region
Terrace Bay Area Office
1004 17 Highway, PO Box 730
Terrace Bay, Ontario
P0T 2W0

Dear Ms. Dennis:

Subject: EBR Registry #011-2469: Slate Islands Provincial Park Management Plan

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, subscribers and supporters, and 740 member clubs, we have reviewed the Slate Islands Provincial Park Management Plan (Plan) and provided our comments and recommendations. The OFAH submitted comments on the Proposed Management Plan in 2011 and 2014; we have taken this opportunity to reiterate/strengthen some of our concerns and recommendations.

Fishing in the Slate Islands Provincial Park
As a natural environment-class park, one of the key objectives of the Slate Islands Park is “to provide high quality recreational and educational experiences.” As mentioned in the Plan, the Slate Islands are a popular destination for anglers, particularly those fishing for red-finned Lake Trout. The perpetuation of these traditional activities has social, economic, and cultural importance for local communities (e.g. Terrace Bay) and to the park itself. The OFAH strongly supports the maintenance of existing fishing opportunities and recommends that future park planning should seek to enhance the quality and quantity of these opportunities whenever possible.

The previous consultative pieces suggested that zoning be used to control land use activities to try to achieve provincial park objectives. This Plan has not expanded any restrictive zoning, but does state that temporal restrictions may be used to limit potential negative impact to woodland caribou. This allows for continued use of the areas, but may result in unnecessary restrictions on the accessibility of recreational opportunities (e.g. shore fishing, camping, etc.) within the park. While the OFAH supports alternative management practices to help achieve park objectives, we strongly feel that any temporal restrictions be site-specific, evidence-based, and consulted on prior to their establishment.

Recreational fishing is an excellent example of an ecologically sustainable and beneficial activity that can help the park to effectively achieve provincial park objectives without compromising other park values. The OFAH recommends that park management planning (e.g. zoning) should thoroughly quantify the socio-economic contribution of fishing to the park and local area. This knowledge will be essential in determining how park planning will impact the benefits that can be achieved through fishing activities.
Woodland Caribou Management
The Slate Islands population of forest-dwelling woodland caribou have experienced periods of overabundance/"boom and bust." The potential for overabundant woodland caribou can have adverse impacts on the unique terrestrial ecosystems of the Slate Islands. The Plan estimates the caribou population at 99 animals (pg.7) and indicates that the boom–bust population cycle is no longer occurring. While wildlife population management states “Active wildlife management, if necessary, through the most appropriate means is permitted to protect existing wildlife populations and to support ecological integrity,” the OFAH recommends that the Plan should incorporate specific population objectives for woodland caribou when the boom phase returns, leading to overabundance. These objectives should reflect the need to sustain a healthy population of woodland caribou, as well as the rare and vulnerable vegetative communities within the park.

Park Management Planning and Public Consultation
The OFAH would appreciate the opportunity to remain engaged throughout the planning process, especially regarding issues related to fishing and caribou management. The OFAH and its membership can contribute valuable local knowledge about significant features of the park, as well as input on how park planning exercises will impact traditional fishing activities.

We look forward to seeing how our concerns and recommendations are incorporated into the approved Park Management Plan for the Slate Islands Provincial Park.

Yours in Conservation,

Robert Cole
Land Use Policy and Habitat Specialist

RC/gh

cc: OFAH Board of Directors
    OFAH Land Use/Access/Trails Advisory Committee
    Angelo Lombardo, OFAH Executive Director
    Matt DeMille, OFAH Manager, Fish & Wildlife Services
    OFAH Fish & Wildlife Staff