

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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OFAH FILE: 430/794
September 5, 2023

Laura Bjorgan
Ministry of the Environment, Conservation and Parks
Land and Water Division - Ontario Parks - Protected Areas Section
300 Water St, 6th Floor S
Peterborough, Ontario
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Dear Ms. Bjorgan

Subject: ERO# 019-6666 Developing a management plan for Bigwind Lake Provincial Park

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest, non-profit, fish and wildlife conservation-based organization, representing 100,000 members, subscribers and supporters, and 725 member clubs. We have reviewed "Developing a management plan for Bigwind Lake Provincial Park" and offer the following comments for consideration.

The OFAH supports efforts to make outdoor spaces more accommodating to people of all backgrounds and experience levels. However, we believe firmly that such opportunities should be made by protecting new spaces, rather than degrading landscapes already under protection. For this reason, we have several concerns about the proposed changes to Bigwind Lake Provincial Park.

Campsites

Regarding the park's new development direction, we are concerned with the intended expansion of existing camping opportunities. Establishment of a 250-site campground, for example, would leave a substantial footprint, necessitating the destruction of large swathes of habitat. The creation of up to 25 new cabins would have much the same effect. These are substantial projects with very real impacts and, in the context of a provincial park, it would require a unique incentive and a thorough environmental impact assessment to justify such an action. Bigwind Lake Provincial Park is home to a wide array of fish, wildlife, and vegetation species, including several species at risk. Considering the province's new "Planning Evaluation Policy" for provincial parks and conservation reserves, which would **exempt most of these proposed developments from any environment evaluation**, our concerns cannot be understated.

Other risks associated with the proposed camping developments include:

- Water pollution from increased human traffic in sensitive areas, especially via effluent and sewage
- Increased human pressure on fish and wildlife, whether directly through activities like fishing, or indirectly through foot traffic
- Increased potential for human-wildlife conflict
- Increased potential for the spread of invasive species

Other development

The OFAH has similar concerns about the establishment of new maintenance roads, maintenance facilities, wastewater treatment facilities, and "comfort stations." The establishment of roadways, in particular, has been demonstrably linked to increased human-wildlife conflict and subsequent wildlife death, especially with Species at Risk like the Midland painted turtle (*Chrysemys picta marginata*), which resides in the park (Dorland, 2014; Langevelde et al. 2009). Additional implications include disruption of existing wildlife corridors, increased runoff and subsequent water pollution from roads (e.g. road salt), auditory pressure from traffic, and impacts on wildlife breeding cycles due to human presence (FHWA, 2011).

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Recreational fishing

Bigwind Lake Provincial Park is home to several aquatic species of recreational importance, including sensitive species like Brook Trout (*Salvelinus Fontinalis*) and Lake Trout (*Salvelinus namaycush*). These especially prized fish are extremely vulnerable to habitat disturbance, pollution, fishing pressure, and invasive species (Marschall & Crowder, 1997; Wilson & Mandrak, 2004). It seems clear that increased human presence within the park has the potential to impact Brook Trout, Lake Trout, and other fish populations significantly and, by extension, have large-scale ecological consequences. Not only is this a conservation concern, but it would also have serious implications for the anglers who have been going to this park for decades.

Ultimately, provincial parks like Bigwind Lake exist, in large part, to protect wild places. Park landscapes are often unique, house vulnerable species, have important ecological functions, and/or are otherwise deemed important enough to set aside. In fact, according to the “Bigwind Lake Provincial Park – Background Information” document, “The maintenance of ecological integrity is the first priority in the planning and management of Ontario’s protected areas.” Provincial parks, especially in the north, also serve as an escape from modern life for many Ontarians. If the provincial government deems it necessary to create a park with the comforts of city life, we recommend they look to the many landscapes currently under threat from unnecessary development for such a project, rather than degrading an existing provincial park. This way, large-scale habitat loss can be minimized whilst achieving the province’s goals.

The OFAH would be happy to work alongside the MECP to help guide relevant decision making in a sustainable direction.

Yours in Conservation,



Matthew Robbins
OFAH Fish & Wildlife Biologist

MR/jb

cc: OFAH Board of Directors
OFAH Land Use/Access/Trails Advisory Committee
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Director, Policy & Programs
Mark Ryckman, OFAH Manager, Policy
OFAH Policy & Programs Staff

References

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- Marschall, Elizabeth A. & Crowder Larry B. (1996). Assessing Population Responses to Multiple Anthropogenic Effects: A Case Study with Brook Trout. *Ecological Applications*. 6(1), 152-67. <https://doi.org/10.2307/2269561>
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