

November 5th, 2004

Bob Moos,
Strategic Planning Officer, Protected Areas Legislation Review
P.O. Box 7000, 300 Water Street,
Peterborough, ON
K9J 8M5

Re: EBR Registry Number: AB04E6001

Dear Mr. Moos,

Earthroots is very pleased that the Ontario Ministry of Natural Resources (MNR) recognizes the need to strengthen protected area legislation. New legislation is long overdue that recognizes the growing popularity of these wilderness areas and the new and increased threats to their integrity.

Legislative Proposal 1: Principles

Earthroots applauds the Ministry of Natural Resources for proposing to make the protection and maintenance of ecological integrity the key principle guiding management decisions.

Recommendation: Make the protection, maintenance and restoration of ecological integrity, through the protection of natural features and functions, the *overriding priority* guiding all aspects of management decisions for all Protected Areas (Provincial Parks, Conservation Reserves and Wilderness Areas)

Earthroots strongly believes that the goal of protecting and enhancing ecological health should be the cornerstone of all park activities. In cases where there is a lack of scientific certainty about potential threats to ecological integrity, the management of our protected areas must be guided by the precautionary principle. Earthroots would like to see the new legislation establish a trust obligation upon the Ministry of Natural Resources to manage protected areas in a manner that maintains their ecological integrity and leave these areas unimpaired for the enjoyment of future generations.

We recommend that the above objectives be the overriding priority for the management of all Provincial Parks, Conservation Reserves and Wilderness Areas under one piece of legislation. This recommendation was made by Ontario's Environmental Commissioner, Gord Miller in his 2001-2002 Annual Report. The Commissioner called Conservation Reserves "half parks". With no on-site staff or independent budgets and looser laws governing what is permitted and prohibited, it is understandable why there is more evidence of environmental damage in Conservation Reserves.

Earthroots supports the definition of ecological integrity that is outlined in the National Parks Act: "**ecological integrity**" means, with respect to a protected area, a condition that is determined to be characteristic of its natural region and likely to persist, including abiotic

components and the composition and abundance of native species and biological communities, rates of change and supporting processes.

Legislative Proposal 2: Objectives

Diverse park objectives can compromise the preservation of the natural environment. Earthroots recommends a legislative ban on sport hunting, mining and motorized recreation in all Provincial Parks, Conservation Reserves and Wilderness Areas.

Ontario's Parks and Conservation Reserves are currently managed for a range of objectives, attempting to *balance* the importance of environmental protection with recreational, commercial and economic interests. These diverse objectives allow many pre-existing uses and activities to continue such as sport hunting, motorized recreation and mining. Earthroots has long been concerned that by allowing these non-compatible, high-impact recreation and industrial activities in Ontario's protected areas, the government is compromising the preservation of the natural environment.

Legislative Proposal 3: Classes and Zones

Earthroots does not support zoning in parks to allow high impact recreation. We recommend that any new classes or zones incorporate the concepts of ecological integrity, biodiversity preservation and ecosystem-based management.

Earthroots does not support zoning in parks to allow high impact recreation such as hunting and the use of all terrain vehicles (ATVs) and snowmobiles, which we feel are incompatible park uses. However there may be a need for different types of zones and designations to more accurately reflect the distinguishing characteristics of different regions of the park that require different management objectives. We recommend that any new classes or zones incorporate the concepts of ecological integrity, biodiversity preservation and ecosystem-based management. For example, we see the need to elaborate on the definition and importance of Historical Parks to recognize the cultural heritage of an area for aboriginal people. With this new emphasis on the importance of Historical Class Parks, many areas of Temagami should be considered for this type of protection designation. Temagami is known for its millennia-old Nastawgan trail and canoe routes which mark the ancient travel paths for the Teme-Augama Anishinabai people. Many areas of Temagami also have historically significant petroglyphs and pictographs and ancient native burial sites. The Spirit Rock, an unusual conjuring rock, representing one of the last undisturbed Ojibway spiritual sites in an old growth forest is an important aboriginal heritage site of spiritual significance to the Ojibway people that is currently at risk from logging.

New park classes should be authorized and established with the approval of Cabinet, if not the Legislature. The inappropriate introduction of the previous government's bill to establish the "Recreation Reserve" land-use category and the resulting controversy should serve as a sufficient example for why the Minister alone should not have sole authorization over this matter.

Legislative Proposal 4: Wilderness Areas

Earthroots supports the reclassification of all of the 10 Wilderness Areas that lie outside Parks and Conservation Reserves as Provincial Parks.

In their current management form, Conservation Reserves do not have the comprehensive policy and assigned administration to fully support and conserve them and thus meet any ecological integrity objectives.

In particular, Earthroots would like to see the Wilderness Area that incorporates High Bluff and Gull Islands within Presqu'île Provincial Park classified as a Nature Reserve. This is the most suitable park classification to recognize the islands as:

- An Area of Natural and Scientific Interest (ANSI)
- A wetland of International Importance under the Ramsar Convention
- A Regional Reserve within the Western Hemisphere Shorebird Reserve Network
- An Important Bird Area (IBA) within the North American Important Bird Areas Program (identified as one of the best birding areas having the largest *most diverse* bird colony in the Great Lakes).
- A Monarch Butterfly Reserve under the Canada-Mexico Declaration on Creation of an International Network on Monarch Butterfly Reserves

The waterfowl hunt that is permitted in this Wilderness Area, which is one of the best birding areas on the Great Lakes is an incompatible and conflicting use. The value of this area as a bird sanctuary should be prioritized. These islands are better suited for bird watching and other forms of ecotourism and the new protection designation should recognize this..

Legislative Proposal 5: Planning and Report

Earthroots supports mandatory requirements for the preparation of park management plans as well as mandatory monitoring and reporting on the state of protected areas within a specified time frame and with appropriate public consultation.

Earthroots recommends the use of indicator species such as wolves to monitor the effectiveness of the new Parks Act for preserving and restoring ecological integrity.

Mandatory reporting on the state of protected areas, mandatory preparation of management plans by a specified time frame and appropriate public consultation over this process is a very sensible and easy to implement measure to improve protected area legislation.

Management Plans

In his 2002 Annual Report, Ontario's Provincial Auditor, Erik Peters criticized the Ministry of Natural Resources for not having management plans or inventories for protected resources in many Provincial Parks:

“Of the 277 Provincial Parks that existed at the time of our audit, only 117 had management plans in place. Furthermore, 68 of the plans that were in place had not been reviewed for more than 10 years, with the average age of these plans being 15 years.” (p 211)

“The Ministry did not maintain a provincial inventory of protected resources, did not know how many inventories were still to be completed, and did not know when existing inventories had been prepared. We also noted that 57% of our sample of non-operating parks did not have a detailed inventory of plants, animal life, geology, and other natural features.” (p 212)

Park management plans are essential planning tools. Without proper management planning, many problems in the park may not be identified and addressed in time. Therefore, Earthroots sees the need for penalties for not creating or following the park management plan. Park staff should follow the precautionary principle when important information derived from the management planning process is not yet available. It seems reasonable that in the absence of a management plan, the MNR should prohibit high impact activities which require more monitoring and enforcement, until there is a management plan in place to ensure these impacts are addressed and mitigated.

Public Consultation

Earthroots interprets *appropriate* consultation to mean that the public is consulted on key management documents and informed about the progress in carrying out stated objectives and goals. We believe that aboriginal people have an important role to play in the management of protected areas so that all Ontarians benefit from their traditional ecological knowledge.

State of Protected Areas Reporting

Earthroots is more concerned about how the state of our parks will be measured and monitored than the format of the report and how it will be presented to the public. Many equate the concept of ecological integrity with biodiversity, which is a measurable phenomenon that is capable of being monitored and managed. We therefore recommend the use of indicator or umbrella species that have a profound impact on an area’s biodiversity to monitor ecosystem health. This recommendation was also made by the Provincial Auditor, in his 2002 Annual Report:

“Focusing on an indicator species and its habitat facilitates the monitoring of ecological conditions and the determination of any corrective action that may be required.” (p 212)

Since it is not possible to include all species in management plans, management for biodiversity requires monitoring populations of, and long-term habitat suitability for, species that are known to be sensitive to habitat fragmentation and other stresses that degrade biodiversity. By protecting the important umbrella species and preserving its habitat, the MNR will be able to improve its ability in protecting a number of other species that depend on the same habitat.

Earthroots recommends the use of wolves as an appropriate indicator species to monitor ecological integrity. Many ecologists classify wolves as an “umbrella” species because their large habitat requirements encompass the ranges and ecological requirements of many more

smaller and less space demanding species. As top predators, wolves are especially vulnerable to disturbances in their habitat and food supply and thus serve as an excellent indicator species for the "wildness" and the overall health of the ecosystem. Protecting wolves would help ensure that the ranges and ecological requirements of many other species are protected as well. The general principle is that if you take care of the ecological needs of an area wolf population you are subsequently promoting the conservation of the whole.

Legislative Proposal 6: Industrial Uses

Earthroots recommends the prohibition of all major industrial uses including mineral exploration, mining, aggregate and peat extraction, power generation and logging in all Provincial Parks and Conservation Reserves by legislation, not just in general policy.

Mining

The current Parks Act permits mining in 23 Provincial Parks. Some major industrial uses are prohibited in some protected areas by general policy rather than regulation. We need clear rules about what is appropriate in parks and what is not.

Earthroots would like to see a quick resolution to the unresolved mining conflicts that still exist in some protected areas. According to an application submitted to the Environmental Commissioner's Office, there are about 700 mining claims in Lake Superior Highlands Conservation Reserve (Environmental Commissioner of Ontario, 2002).

Earthroots has been working with local citizen groups to try to stop a quarry operation in Mellon Lake Conservation Reserve since 1999. Though the mining company's first two applications for permits were rejected during the public consultation period and in the MNR's final decision, the company has applied a third time. The government needs to close up the loophole in the Aggregate Resources Act, which allows companies to continually re-apply for permits even after extensive public consultation.

Logging in Algonquin

Logging should be included in the terms of reference of the Parks Act review so that at the very least, the ecological impacts of this activity are assessed and considered. Earthroots supports a long term phase out of logging in Algonquin Provincial Park. We see no impediment to examine the possibility of restricting logging further with the long term goal of a complete prohibition. Logging has been phased out of other parks like Lake Superior, Quetico and Wood Buffalo. The methods used to phase out logging in these parks should be reviewed.

The origin of Algonquin may owe itself to the logging industry but the need to protect Algonquin as a forest reserve is no longer there. The park now has greater value as a wilderness park and we believe this value will only increase in terms of revenue generated from ecotourism and ecological benefits as the impacts of logging decline in the park. While Earthroots recognizes that sustainable forestry practices are employed in the park we would like to see this type of logging practiced elsewhere in the province.

Legislative Proposal 7: Non-Industrial Uses

Earthroots recommends a legislative ban on high-impact recreational activities such as sport hunting and the use of snowmobiles, all-terrain vehicles (ATVs) and motorboats and the construction of new roads and trails or expansion of existing roads and trails for these activities.

Earthroots does not support the MNR's proposal to address 'non-industrial uses' such as hunting and motorized recreation through regulations or policy rather than legislation.

Sport hunting is allowed in 428 'regulated' Protected Areas (115 Provincial Parks, 303 Conservation Reserves and 10 Wilderness Areas) amounting to 75% of the protected land base.

On page 1 of the Ontario Federation of Anglers and Hunters' (OFAH) submission for the Parks Review Questionnaire, they state "Prohibitions/restrictions on angling, hunting and/or motorized uses for these activities must be based on conservation or safety". Earthroots agrees. Earthroots is opposed to sport hunting in Provincial Parks and Conservation Reserves for the protection of wildlife and the safety of park users. We classify hunting as a high-impact recreational activity for the following reasons:

New roads and trails for motorized access

- Hunting has an accumulative impact. When hunting is allowed in an area it is often associated with an increased demand for more access into the area by the user group. Whether it be the construction of new roads or trails for ATVs or the expansion of existing roads and trails, the negative impacts on the integrity of the park from the increased access are widespread. Potential environmental impacts include habitat fragmentation, erosion, increased road kill, damage to vegetation, displacement of wildlife, and an increase in the number of consumptive park users because of the convenient access.

ATVs

- The growing popularity of ATVs will undoubtedly be an increasing environmental problem in Ontario in the absence of appropriate enforcement and monitoring. The development of new roads and trails has been left up to the discretion of district managers and park superintendents. The result has been ongoing approvals to satisfy the vocal, local user groups. ATVs are effective facilitators of the spread of invasive species, the sheer noise of these machines scare wildlife, they rut the soil, make a mess out of the trail system, and are an added conflict with the interests of the low-impact recreationalists. ATV damage (from off-trail riding) is apparent in Charleston Lake Provincial Park, the Kawartha Highlands Provincial Park, ATVs have damaged provincially significant wetlands in the Queen Elizabeth Wildlands Provincial Park and damaged sensitive sand dunes in Presqu'île. All of these protected areas are popular for sport hunting.

Non-targets

- The MNR must expect that one of the impacts of allowing hunting in parks is that a certain percentage of the wildlife killed will be non-target species. A local birder and naturalists in Presqu'île Provincial Park tells us he is astounded at how many duck hunters don't recognize what they are shooting. This concern increases knowing that Ontario Parks are home to many species at risk.

Qualitative impacts on wildlife populations

- Earthroots is not just concerned about the number of animals that are killed every year in Ontario's protected area system but also the qualitative impacts that hunting has on different species (which is a newer area of scientific research) and the effect this has on natural ecosystem functions. If bait is used then there are other concerns about the impact this activity has in pulling animals away from their natural pathways and travel routes, the increased success rate of this method of hunting and the potential for more human-wildlife conflicts as the animals become habituated to food handouts.
- Hunting disrupts natural predator-prey relationships (hunters don't mimic the effects of natural predation by taking the sick and the weak animals nor do they leave pieces of meat for scavengers)
- Hunting scares away both target and non-target species. Earthroots staff witnessed evidence of this in Presqu'île during the cormorant cull on High Bluff Island where the egrets and herons that the MNR was trying to protect actually left their nests on the island during the cull.

Earthroots' opposition to allowing hunting in parks and protected areas is also based on a matter of principle: the wildlife are not protected in our parks and reserves if it is permissible to shoot them. You cannot get a more direct impact on a wildlife population than shooting wildlife. From a provincial standpoint, it makes ecological sense to view parks as sanctuaries for wildlife and benchmarks for how an ecosystem can persist with minimal disturbance and intervention and indeed that is what most Ontarians envision their parks to be - *wildlife sanctuaries not hunting grounds*. Sport hunting conflicts with other societal views and ethics on wildlife conservation.

Since sport hunting is consumptive in nature and selective in species preservation (game species preferred), it often becomes incompatible with the larger objective of maintaining ecological integrity. If you are managing a park for wood, minerals or game, you are not managing the park for ecological integrity. As soon as a price tag is put on the game species, there is a polarization of values and more emphasis on protecting the wildlife that have financial value over other natural values that don't directly correlate to dollars and cents.

Lack of information

A telephone survey conducted by Earthroots in 2003 found that not only are park staff unaware of how many wildlife species are hunted in the park every season, but they didn't even know who managed hunting.

For example, when I called the Park Warden in Darlington Provincial Park, he didn't know anything about the hunt and told me to contact the O.F.A.H. When I called the Park office for

Rock Point with questions about the duck hunt permitted there, I was told to call the MNR in Vineland. When I did as they recommended, I found that the MNR office in Vineland did not know who administered the hunt either. In fact, the staff person that I spoke with believed that the park office did. The conclusion I received was that harvest reports are not reported to anyone at any office. How does the MNR ensure that hunting does not threaten park wildlife populations or the ecological integrity of the area when there is no reporting of the number of animals killed this way per year? How are the ecological impacts of hunting currently assessed?

Costs of Enforcement

The MNR should assess whether the revenue generated from hunting in parks fully recovers the costs of administering and enforcing the hunt. If there is not enough money to have a warden in the field full time during hunting season to enforce access and prevent violations, than hunting should not be allowed.

However, Earthroots would rather see money from the Ontario Parks budget prioritized for research, management planning, education and restoration rather than allocating funds to improve the monitoring and enforcement of hunting and motorized access. Earthroots recommends prohibiting these high impact activities all together if not for preserving the natural environment than for the money that could be saved from the additional operational costs and enforcement costs that are necessary when hunting is allowed in the area.

Safety of other park visitors

Earthroots is also concerned about the safety of other park visitors during the hunting season. The MNR encourages Ontarians to wear bright orange safety vests when entering a park during hunting season yet at the same time actively promotes nature-based tourism such as hiking and camping as a year-round activity in these same areas.

The MNR makes little effort to alert visitors of this dangerous and often conflicting park activity in the Ontario Parks Guide or other park literature. In fact hunting is not even mentioned on any of the 92 pages in the Ontario Parks Guide.

In Lake Superior Provincial Park, there are 3 hiking trails in the hunting area that also have road access. Rather than put a signing informing people of the hunt, the park staff take the 'hiking trail' signs down during hunting season. They don't prohibit hiking in the hunting zone but they don't encourage it either. This passive method of ensuring the safety of park visitors is simply unacceptable.

Waterfowl hunting in particular could pose a serious risk to canoeists and bird watchers. At a recent visit to Presqu'ile Provincial Park during the waterfowl hunt, I was surprised to see people surfing on the lake close to the hunting blinds.

Public opinion

Province-wide polling has repeatedly shown that the vast majority of Ontarians oppose sport hunting in Protected Areas. In fact, more people are opposed to the allowance of hunting in parks than any other permitted use including mining and logging.

A survey conducted by Sudbury based, Oraclepoll in March 2004 revealed that 88% of Ontarians strongly opposed hunting in parks, including 84.4% of people who live in Northern Ontario and 66.7% of people who have a hunting license in their household. The fact that many hunters oppose hunting in parks shouldn't be surprising since our earliest definition of a protected area in Ontario comes from the concept of game preserves – places where wildlife were protected to ensure sustainable populations for future generations of hunters to shoot.

The survey also revealed that the protection of wildlife and wildlife habitat was seen as the primary purpose for Ontario's parks.

Conflicts with other recreational activities and success of ecotourism

In Southern Parks like Presqu'île and Darlington, the waterfowl hunt often occurs in the best birding areas in the park so there is a conflict of interest and values between the different user groups. Potential ecotourism dollars are being driven away by allowing the hunt in these popular birding areas.

Nature-based tourism is a growing industry that spans all seasons and is a vital component of the shifting economies in Northern communities. Imagine the promotional opportunities if we could invite people from all over the world to explore and observe natural processes in more than 600 Protected Areas where hunting is not permitted? Racine Lake Campground, the only private camp ground in Chapleau Crown Game Preserve attracts many tourists by advertising the increased wildlife viewing opportunities in the area as a result of the fact that hunting and trapping have not occurred there (in the Preserve) since 1925.

According to an Environment Canada report released in 2000, *The Importance of Nature to Canadians*, outdoor activities in natural areas, such as picnicking, photography, climbing, sailing, camping etc. brought 2.9 billion dollars to Ontario's economy. In addition to this, wildlife viewing brought in 410 million dollars for a total economic boost of 3.3 billion dollars. Compare this to fishing and hunting activities, whose economic contribution doesn't even reach the one billion dollar mark.

With over 90% of the public land in Ontario already available for hunting, it is unfair to the majority of Ontarians that 'protected' areas be open to this activity as well. The fact that sport hunting is currently permitted within 75% of the protected land base is an indication that even the MNR's 'objective to balance' different park uses and values is currently not being met.

Since Ontario's parks and protected areas are public places, belonging to all Ontarians, permitted recreational activities should not compromise the enjoyment of other users and should have low environmental impacts so as to leave the area unimpaired for future generations.

In conclusion, Earthroots views sport hunting as a non-compatible land use activity in Ontario's parks and protected areas. Provincial Parks and Conservation Reserves comprise just nine per cent of Ontario. This would be a very small gun-free area to set aside for the preservation of wildlife and natural features as well as the safety of other park visitors. The vast majority of crown land is already opened to sport hunting. Is it not reasonable to preserve a fraction of the landscape for hiking, nature photography and wildlife viewing as well; activities that many see as being incompatible with sport hunting?

Legislative Proposal 8- Administration/Enforcement

Budget

Earthroots supports retaining the Special Purpose Account to ensure that all park revenue is used for the management of Provincial Parks. We would also like to see more money allocated to Ontario Parks programs in the next provincial budget.

The MNR budget has been cut significantly and Earthroots believes this has taken a toll on the way our parks are managed and protected. Since 80% of the Ontario Parks budget comes directly from park revenue, Earthroots supports retaining the Ontario Parks Special Purpose Account to secure all park revenue for the purpose of managing and protecting parks. Earthroots would like to see more funding allocated to Ontario Parks programs in the next provincial budget and we will be presenting our comments on this to the Ministry of Finance. According to the 2002 University Victoria Report, while Ontario's park visitor numbers have increased by 60% over the last 15 years, the parks management budget has been slashed by 62%. The Report gave Ontario a failing grade in park management. The report concluded that inadequate funding for protected areas was a leading reason for the decline in the ecological integrity of parks (Boyd, 2002).

Sufficient funding also needs to be allocated for the management of Ontario's 249 Conservation Reserves, which are regulated under the Public Lands Act and do not have independent budgets or any on-site staff to enforce regulations and monitor the area.

Earthroots supports partnerships between the MNR and individuals, local community groups, environmental organizations, First Nations communities and universities and colleges to support park stewardship, marketing and promotion of protected areas, outdoor/nature education and research so long as the interests of these groups does not go against the park's primary objective of restoring and preserving ecological integrity.

Earthroots supports the provision of new authorities to facilitate and encourage gifts, donations and bequests to support protected areas so long as these can operate with low administration costs. An individual or groups' donation to Ontario Parks should not increase their ability to influence park management decisions.

Enforcement

Funding needs to be restored to the Ontario Parks budget so that park managers and conservation officers have the resources they need to protect and monitor our parks. Although the previous

government established 378 new Provincial Parks and Conservation Reserves areas as a result of the Lands for Life land-use planning process, they did not allocate an equivalent increase in staff to monitor and manage these new protected areas.

Ontario's Provincial Auditor reported in his 2002 Annual Report, that three quarters of the park superintendents who responded to a survey stated that the parks that they are responsible for had not been adequately maintained to ensure that natural resources were protected.

Earthroots supports updating fines and penalties and giving the appropriate enforcement powers to conservation officers to protect natural park values.

Permanent Boundaries

Currently, provincial parks can be eliminated at a meeting of the provincial Cabinet at any time. The MNR has even changed the boundaries of some protected areas to allow roads, industrial waste discharge and mineral exploration.

We do not support new legislation to allow the Minister of Natural Resources to make regulations that have a significant environmental impact with the mere approval of Cabinet behind closed doors.

Earthroots recommends a new legislative amendment to permanently protect the boundaries of Provincial Parks and Conservation Reserves for future generations so as not to reduce the area of protection. However we fully support adjustments of the boundary to increase the area.

Additional Comments

Park management must not end at park boundaries

The MNR's "Room to Grow" Strategy should include the need for buffer zones and corridors. These goals and objectives must be enshrined in the new legislation.

The increasing loss of biodiversity is one of the most critical environmental problems facing the world today. Many conservation biologists argue that our many scattered parks will not be sufficient to preserve biodiversity unless they are connected to each other. Even the largest parks are not large enough to sustain the long-term viability of ecosystems, species and genetic diversity (Noss et al., 1997).

Earthroots strongly believes in the need for corridors to link our parks and protected areas together to facilitate the migration of species, the exchange of genetic material and energy and to increase biodiversity. Even relatively small inputs of genetic material into a population can dramatically increase the persistence of a population, and allow species to survive in parks that would otherwise be too small (Forbes, 1993). Conservation biologists had initially argued the need for corridors to protect animals with large space requirements, such as wolves and bears but plants and insects need connective corridors as well. Corridors that facilitate the movement of

plant and wildlife species will help ecosystems adjust to changes in the environment including changes in climate.

Buffer zones may also be necessary around some parks to restore and preserve ecological integrity. When activities with a high environmental impact are permitted just outside park boundaries, it may counteract the positive ecological effects of the protected area. Land use pressures adjacent to protected areas must be adjusted so the goal of conservation is not negated by the high rates of exploitation at the park periphery. Wolves have only been the subject of intensive research in Pukaskwa National Park and Algonquin Provincial Park. Both of these studies concluded that the park's wolf population was declining primarily due to high levels of hunting and trapping outside park boundaries. Are our parks working if the majority of wolf mortality is attributable to human activity?

If wolves are selected as an appropriate indicator for biodiversity and ecological integrity, it would be shown that few of Ontario's Provincial Parks and Conservation Reserves actually work to protect this species.

Wolves have large territories, and are capable of covering 75 km per day, requiring large, contiguous wilderness areas to survive. Many wolf biologists, including Ontario's authority on wolf ecology, Dr. John Theberge have estimated that an area of at least 500 km² is needed to ensure the long-term viability of a wolf population (Theberge, 1991). This is the approximate area of Isle Royale National Park on Lake Superior where wolf-prey relationships, uninterrupted by humans, have been the subject of long-term research. It is the smallest isolated area recognized for supporting a sustainable Gray wolf population. Considering this criteria, wolves are only protected on 3% of their range in Ontario. From a provincial perspective, Ontario's protected area network fails to protect a naturally vulnerable species that is key to biodiversity preservation. Even in the few parks that are of a large enough size to sustain a viable wolf population and off limits to traps and bullets, buffer zones are needed to curb the high levels of hunting and trapping outside park boundaries.

Without buffer zones and corridors, Ontario's parks and protected areas are ecologically dysfunctional islands in the landscape. Earthroots has contributed funding for corridor studies conducted by researchers at the University of Toronto and Ancient Forest Exploration and Research based in Powassan. We would be more than happy to make the results of these studies available to the Ministry of Natural Resources.

Increases in park visitation

One of the biggest issues that the MNR will have to deal with is the growing number of park visitors and the increasing impact this will have on ecological integrity. Even non-consumptive activities such as photography, hiking and wildlife viewing can have potentially negative impacts on the natural environment particularly if visitor numbers increase and are concentrated in one particular region of the park. How will the MNR accommodate more people without compromising the natural values the park was established to protect?

Conclusion

Each year, the number of species threatened with extinction increases as a result of habitat loss, hunting and trapping pressures and a shamefully slow and incomplete protection process. According to the MNR, close to 200 of the animals found in our parks are considered rare or endangered species at risk. Yet there are no requirements in the current Parks Act to manage parks to protect habitat, even for endangered species. As Ontario's population approaches 12 million, our cities continue to sprawl and our air and watersheds become more polluted, the need to protect wilderness areas from these disturbances becomes critical. For these reasons Earthroots advocates for a more stringent approach to wilderness preservation with less compromise in accommodating pre-existing uses that have a negative impact on the ecological integrity of the area. Protected areas are just a small fraction of the provincial landscape to set aside for the preservation of wildlife, natural features and for future generations to enjoy.

Thank you for allowing us to make this submission. We appreciate the time of the Parks Advisory Board and MNR staff to read our comments. We sincerely hope you will consider our comments when making your recommendations to the Minister.

Sincerely,

Melissa Tkachyk, M.E.S.
Earthroots Wilderness Campaigner

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