

NOTO SUBMISSION TO THE ENVIRONMENTAL REGISTRY ON WAWA CLUAH

This document contains the comments that Nature and Outdoor Tourism Ontario (NOTO) submitted to the environmental registry on the Wawa Crown Land Use Atlas Harmonization project (CLUAH). The CLUAH held a series of open houses in the Wawa District during the month of July. These open houses main focus were to present several Land Use planning options to the district. Below is the response NOTO submitted.

August 26, 2011

Comments on the Proposed Options Presented for the Wawa CLUAH Project

Introduction

NOTO represents the interests of the Nature and Outdoor Tourism Industry, including Remote, Semi-Remote and Drive-In businesses. A high quality natural environment is an essential element of all of these experiences and is a primary determinant of product value. It follows, therefore, that natural resource management practices that maximize the quality of the natural environment will also maximize value to the Tourism Industry and to local communities and the Government of Ontario.

Motorized and non-motorized outdoor recreations are fundamentally incompatible activities. The very things that remote tourists and recreational users seek – quiet, solitude, the sense of being in a wilderness place – are completely disrupted by the presence of mechanized recreation.

A sense of “wilderness”, the feeling that you are in a very remote and relatively untouched place, is an increasingly rare experience anywhere in the world. Even in Northern Ontario, the availability of these experiences has been steadily shrinking, largely due to the failure to address these issues through land use planning. The use of the Forest Management Planning process to plan road use and ultimately manage remoteness has been ineffective. It has led to a steady erosion of remote values and created a climate of uncertainty for both the Forest and Tourism Industries. For the Tourism Industry, this uncertainty has seriously reduced investment in new facilities and experiences.

Yet research clearly demonstrates that remote experiences are much more highly valued – a client of a remote tourism establishment will pay two to three times more for a remote experience. The Wawa District has one of the few remaining pockets of high value Remote Tourism in the Northeast Region. There has been significant loss of remote values and remote tourism businesses over the past twenty years despite the protections provided by the Wawa District Tourism Strategy. A number of high quality fly-in tourism businesses have thrived in the district for many years and are a significant contributor to local economies. This district also contains most of the few remaining rail accessible remote tourism establishments in Ontario, a tourism experience that enjoys strong demand, particularly in overseas markets.

Road Based Tourism and road based recreation are important both economically and culturally to the communities in the Wawa District. An effective planning process must recognize this value and seek to enhance opportunities, particularly economic opportunities for local communities. However, it would be the worst sort of resource mismanagement to enhance road-based opportunities at the expense of scarce and more highly valued remote opportunities.

Any assumption that road-based tourism and recreation opportunities are directly related to the number of roads available should be questioned. Roads built for forestry purposes are often poorly marked and mapped and maintenance into the future is uncertain. Activities like ATV touring require marked and mapped trails of known and predictable quality.

The creation of Road Based Recreation Areas is a significant step forward. It allows limited resources to be directed toward maintaining and enhancing recreational road quality and opportunities and provides greater planning certainty around the development of new tourism and recreational offerings.

Road Based Recreation Areas – A Common Element of all Proposed Options

The creation of areas that are to be managed to enhance the quality and availability of motorized recreation opportunities is present in all options. This is an extremely worthwhile undertaking with a number of potential benefits.

- Recognizes the need to separate remote and road-based recreation
- Focuses effort and resources on “best bets”
- Allows planning around identified needs
- Creates clearer direction and greater certainty for the Forest industry
- Has the potential to provide for new tourism opportunities
- Improvements to recreational quality have the potential to reduce pressure for increased road access to remote areas
- The vast forest road network in the Wawa District is unsustainable and largely unusable to most potential users. Smaller dedicated road-based recreation areas are potentially sustainable and could enable the development of more and higher quality tourism

Option D

Option D represents a real attempt to undertake land use planning and to address the underlying issues that have led to delays and uncertainty for both the Forest and Tourism industries, as well as continuing erosion of opportunities for non-motorized recreational users. This option achieves several important things.

- Identifies areas of greatest current remote tourism use and remote recreation potential
- Provides greater clarity to all users by managing remote values on a zonal basis rather than depending on buffers or other values-specific prescriptions
- Greatly simplifies road planning for the Forest industry by controlling recreational motor vehicle access on a zone rather than road-specific basis
- Provides clarity and reduces confusion for recreational users
- Provides clear protection and long-term predictability for the Tourism industry, thus enhancing the climate for investment

Option D is the only approach being presented that uses land use planning to create a distinctly different and valuable tourism and recreation experience that preserves and enhances the economic and social value provided by remoteness – it creates *functionally roadless areas* which add economic value to the land base.

Note: The suggestion made in several options for a recreational road corridor through a Remote Access Enhanced Management area should be rejected in favour of locating this corridor in a nearby Recreation Zone or General Use Area. The proposed location would detract significantly from the remote character of the area and offers few practical advantages over other possible locations. There appear to be available corridor locations that would also bring benefits to other nearby communities, such as White River and these alternatives need to be carefully considered.

Option C

Although this option (with the removal of the road corridor) can meet most of the objectives of Option D, it has numerous disadvantages. Because it maintains use of currently used roads for motorized recreation, buffers or other forms of protection for remote values will still be needed, and the probability of future and ongoing environmental bump-up requests from remote tourism and recreation interests is likely. Although natural abandonment would eventually reduce motorized use, this process would likely take many years. Compared to Option D, it is much more complex and confusing and provides a great deal of planning uncertainty to the Tourism and Forest industries.

Option B

Because this option trades old roads for new roads, it does absolutely nothing to increase the level of remoteness. The process of “trading roads” in the future is likely to be highly contentious and will be an ongoing source of uncertainty for Remote Tourism and other remote recreation users, and the probability of future and ongoing environmental bump-up requests from remote tourism and recreation interests is likely. It creates an Enhanced Management Area largely in name only, since the overall management and character will be almost indistinguishable from a General Use Area.

Option A

This option would effectively remove almost all existing protection of remote tourism and recreation values. Current protective buffers would be substantially reduced in size and eliminated for all but three months of the year. This would put remote tourism and recreation interests in the position of having to fight the development of every logging and industrial road or trail that could in any way create possible road access into remote recreation and tourism values. The unrestricted access to the fisheries and other resources in these areas would completely erode the value of these areas and almost certainly drive most of the remote tourism operators out of business. The probability of future and ongoing environmental bump-up requests from remote tourism and recreation interests is very high, and this would be a disincentive to forestry and mining development.

It is difficult to imagine how this option can even be considered as Land Use Planning. It is, in fact, an attempt to eliminate a suite of management tools that have successfully protected a significant portion of remote values in the Wawa District over the past 30 years. It does not represent a new approach to planning – it calls for the elimination of planning for anything but unrestricted motorized access to the entire Wawa District.

Because this approach effectively eliminates protection for Remote Tourism values, it is in clear conflict with several provincial policies, such as the *Resource Based Tourism Policy* and the *Memorandum of Understanding on Resource Stewardship Agreements*.

If this or other options that significantly reduce protection and investment value for the Tourism industry is implemented, it would undoubtedly trigger a lengthy process of Environmental Review and legal challenges by the Tourism industry. This is precisely what the CLUAH process seeks to avoid.

Summary

Some have attempted to suggest that Road Based Tourism opportunities have been limited by the protections provided to Remote Tourism in the current Wawa District Tourism Strategy. We have not seen a single sustainable argument to support this. Existing experience and research has shown, for example, that ATV Touring does not require roads and trails everywhere - it requires high quality, well marked and mapped itineraries, with appropriately located rest and activity stops. This is amply demonstrated by the success of the Ontario Federation of Snowmobile Clubs trail experience.

The inclusion of Enhanced Road Based Recreation Areas in the proposed options is a sensible approach to addressing concerns about Road Based Tourism. Road Based Recreation and Remote Recreation are not compatible and conflict is inevitable if they take place in the same area. The development of separate areas that are actively managed for each type of recreation will improve the availability and quality of opportunities. Current challenges to Road Based Tourism are due to limitations to the quality not quantity of available opportunities. If this management approach succeeds in increasing quality through better planning, both tourism businesses and local recreational users will benefit.

Contrary to the views put forward by some advocates for motorized recreation, that constituency is not under serviced. The vast majority of forest access roads in the Wawa district are available to motorized users. Relative to the population, this group has a huge number of roads to use to enjoy their preferred form of recreation.

The remote tourism industry has been a part of the local economy for more than 60 years. Remoteness makes the experiences they provide unique and valuable. If this exercise fails to enhance rather than erode remoteness, it is indefensible as a resource management exercise. Remoteness is a natural resources value as surely as cubic meter of fiber is. Deliberately eroding remoteness is comparable to burning a valuable piece of prime timber in a campfire rather than using it to make furniture.

This exercise is an opportunity for MNR and the government of Ontario to show resource management leadership and to set the stage for such leadership in districts across the province. If not, countless resources and five years of volunteer and government time will have been wasted.