



ECO WATCH

"Monitoring The Health Of The Algonquin Ecosystem."

Mr. Jim Murphy, Park Planner
Algonquin Provincial Park Box
219, Whitney, ON KOJ 2M0

September 14, 2012

**RE: Proposed Amendment to the Algonquin Provincial Park Management Plan to Address
Lightening the Ecological Footprint of Logging - ER# 010-8824**

Dear Mr. Murphy;

Following are Algonquin Eco Watch comments regarding the above proposed amendment.

In general we welcome this document and feel that many of the proposed changes will be beneficial to the Algonquin Park Ecosystem. However, we feel that the final product is biased toward wood production and canoe routes, without sufficient thought being given to the overall wellbeing and sustainability of the ecosystem.

I include a letter that was submitted during a previous public consultation to Ms Dorothy Shaver of the Ontario Ministry of Natural Resources, outlining our concerns. Those concerns remain, as follows.

In recent consultation with Ontario Parks staff, we learned that (their quote)"one third of the LTF (Lighten the Footprint) area would be in larger areas not associated with water (what you may call upland forest) and 2/3rds would be in the 200m wide or 120m wide strips along waterways". This clearly indicates that a), greater sound and view protection is being given to paddlers and b), the Algonquin Forestry Authority is receiving credit for giving up mainly riparian areas that yield only moderate quality forest products at best. Meanwhile, no additional protection is provided specifically for permanent old growth upland areas, which are of extreme importance to many wildlife and bird species. Incidentally, such upland areas invariably produce high quality marketable pine and hardwood.

It is our understanding that the AFA has recently been harvesting considerably less than its annual allowable cut. If mills can stay solvent under these conditions, then we are unable to understand why dedicating more land within the area of operations to upland permanent old

growth stands represents such a hardship to them. Do they not realize what an incredibly positive public relations coup that would be?

In fact the current forest management plan for the Park will not lose any wood supply because of the LTF amendment to the Park's Management Plan. The same amount of wood will be harvested, with or without the LTF amendment. To indicate that the LTF amendment will actually lighten the ecological load that forestry puts on the Park's ecosystem is just wrong. If you have any evidence that the ecological load will actually be less, will you please make it available to us?

The Forest Management Guide for Preserving Biodiversity at the Stand and Site Scales and its accompanying document the Forest Management Guide for Preserving Biodiversity at the Stand and Site Scales - Background and Rationale, state in the latter document that "Regular harvest, renewal and tending are permitted within the AOC". However, on page 8 of The Proposed Management Plan Amendment (2012) (PMPA), the statement is made that "areas of concern (AOC's)... are unavailable for forest management". Further, the PMPA states that "48.8% of the park area ... is either protected from or unavailable for forest management". Conflicting statements such as these only serve to confuse the public and throw into question the credibility of the entire document. So, areas of Concern (AOCs) can have forest management, although with specific prescriptions. But it is neither honest nor reasonable to say that they are always unavailable for forest management. Likewise, in some cases, "swamp" can be harvested, usually for cedar or other species specific to swamps, usually in winter.

Therefore, the true portion of the Park where forestry is not permitted by zoning is actually 34.7%. In other words, foresters cannot go there and do anything related to forestry - No matter what. Even if there is high quality wood there, they can't go there. To try and raise this percentage unjustifiably to 48.8% is obviously a manipulation of statistical truths and is intended to appear to be "Lightening the Footprint of Forest Management".

When asked by Algonquin Eco Watch at a recent meeting, why set-backs from waterways appear to be wider in western Algonquin Park than in eastern AP, it was explained by Ontario Parks staff that owing to the greater market value of tree species growing in the east, e.g. pine, than species growing in the west, e.g. hardwoods, the AFA was more willing to give up marketable timber on the west side than on the east side; once again pointing to commercial value rather than sustainability of the ecosystem, as being the driving force behind the decision-making process. We therefore question the legitimacy of not having a uniform setback width of 200m throughout the entire R/U Zone.

The exception to the above is the continued use of standard setbacks for headwaters. The assumption here is that groundwater sources will all be protected if one setback width is applied. If logging activities or aggregate removal are allowed within headwater catchment areas, it is inevitable that groundwater stability will be negatively affected over long-term forest operation 30-year rotations. All headwaters must be treated as unique and forest management activities excluded from their individual catchment basins. While "downstream" paddling opportunities are certainly important, it must not be forgotten that if the headwaters fail, there will be no downstream paddling.

On page 12 of "the PMPA document", the bottom bullet point uses the words "minimize" and "rehabilitate". Merely minimizing environmental impacts to aggregate sources means that each 20-30 year rotation will inflict further environmental impacts to a steadily diminishing non-renewable resource. This can never be considered to be sustainable. The word "minimize" here should be replaced by the word "eliminate". Aggregate sources are not renewable and therefore cannot be "rehabilitated". The best that can be hoped for is "cosmetic landscaping" after each subsequent rotation. On the other hand, if environmental impacts are eliminated as they should be, then there will be no need to either "minimize" or "rehabilitate". Admittedly, this is a difficult issue to resolve. Unfortunately however, neither Ontario Parks nor the Algonquin Forestry Authority have as yet recognized and/or seen fit to discuss the problem.

In summary, this document was prepared jointly by the Ontario Parks Board and the Algonquin Forestry Authority. The Ontario Parks Board's primary interest is improving the canoeing experience in Algonquin Park (a laudable goal). The Algonquin Forestry Authority's primary interest is producing marketable timber products. This has left little room for serious consideration of input from groups such as Algonquin Eco Watch, whose primary interest is sustainability of the Algonquin Park Ecosystem. While the resulting document has produced some positive change within the Park, it is our opinion that the change is too "self-serving" in nature and unfortunately falls far short of the Ontario Parks mandate for a Natural Environment park, which is (or should be) the long-term sustainability of the ecosystem.

Algonquin Eco Watch feels that this document is very incomplete, has failed to consider the concerns of all interested stakeholders and definitely deserves more public discussion. Our Board of Directors would welcome the opportunity to discuss our concerns with you.

Yours very truly,

A handwritten signature in black ink that reads "Mike Wilton". The signature is written in a cursive, flowing style.

Mike Wilton,
Director.