

January 22, 2021

**Joe Yaraskavitch, RFP**

District Management Forester

Pembroke District

Ontario Ministry of Natural Resources and Forestry

31 Riverside Drive

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By email: [joe.yaraskavitch@ontario.ca](mailto:joe.yaraskavitch@ontario.ca)

**RE: Algonquin Park Forest 2021-2031 Forest Management Plan**

Mr. Yaraskavitch,

The Ottawa Valley Chapter of the Canadian Parks and Wilderness Society (CPAWS-OV) welcomes the opportunity to comment on the proposed 2021-2031 Algonquin Park Forest Management Plan.

CPAWS-OV is fundamentally opposed to industrial activities taking place in parks and protected areas. We have been calling for an end to commercial logging in Algonquin Park for many years. CPAWS-OV and our partners successfully advocated for the inclusion of a clause in the 2006 Ontario Provincial Parks and Conservation Reserves Act enshrining the maintenance and restoration of ecological integrity as the primary management objective in the province’s parks and other protected areas. The Act defines ecological integrity as “a condition in which biotic and abiotic components of ecosystems and the composition and abundance of native species and biological communities are characteristic for their natural regions and rates of change and ecosystem processes are unimpeded”. In other words, ecosystems have integrity when their lands, waters, native species and natural processes are intact. The Act states that the objective for provincial parks and conservation reserves is to “permanently protect representative ecosystems, biodiversity and provincially significant elements of Ontario’s natural and cultural heritage, and to manage these areas to ensure that ecological integrity is maintained”. The Recreation and Utilization Zones in Algonquin Park do not meet standards established by the International Union for the Conservation of Nature (IUCN) as extractive industrial activities are counter to categories I, II and III of the IUCN which represent provincial parks in Ontario. Logging has successfully been phased out of all of Ontario’s other parks. The province of Manitoba effectively terminated logging in all its provincial parks in 2009 (with one exception) and the industry adjusted without significant disruption to operations. CPAWS-OV supports the recommendation by the Ontario Auditor General in her 2020 annual report that a comprehensive assessment of the impact of commercial logging on the ecological integrity of Algonquin Park’s ecosystems be conducted in an open and transparent manner.

Industrial scale logging is, simply put, incompatible with the conservation mandate of Algonquin Park and must be phased out with the possible exception of limited indigenous harvesting for community and traditional purposes.

Based on an evaluation by CPAWS-OV of the current state of the forest sector in eastern and central Ontario as well as in western Quebec, we are of the opinion that sufficient wood volume can be sustainably harvested from forests surrounding the park to satisfy the needs of the industry to maintain the economic viability of the sector. We are calling on the Ministry of Natural Resources and Forestry to conduct a public and transparent evaluation of the forest potential of the public forest outside of Algonquin Park to determine if sufficient wood volume exists and to invest in both the public and private forest to ensure the long-term vitality of the forest sector in the region.

As the Covid-19 pandemic illustrated during the summer and fall of 2020, there is considerable interest in parks and protected areas by both Ontarians and visitors to the province. The elimination of logging in Algonquin Park could create a range of new recreation-based tourism opportunities for the communities surrounding the park, including new employment opportunities and investment in the region. We recommend the Government of Ontario put in place a transition fund to help communities plan for new opportunities as logging is phased out of the park.

With respect to the Forest Management Plan for 2021-2031, CPAWS-OV recommends that the MNRF invest in defining, characterizing and mapping areas of undisturbed, old-growth or otherwise mature forests with old-growth values such as indicative species, snags, pits and mounds and large, decomposing trunks on the forest floor. These areas should not be logged for their intrinsic value, but also because older forests are known to harbour high levels of biodiversity, including species at risk.

The road network in Algonquin Park is extensive and fragments park ecosystems while allowing invasive species to penetrate deep into the park's back-country. Roads also contribute to disrupting natural wildlife interactions as some species are known to avoid roads, including seasonal and logging roads, and for a considerable time after the road ceases to be actively used. Wolves, for example are one species that is known to avoid roads and other fragments which often separates them from potential prey. The estimated 6000 km of roads inside the park also facilitates illegal harvesting of precious park resources. In the context of the 2021-2031 Forest Management Plan and until such time as a phase out plan is in place; no new roads should be constructed, and existing roads should be decommissioned by removing stream crossings and by scarifying the roadbed to encourage vegetation growth. In particular, a significant portion of the far eastern portion of Algonquin Park, which includes areas near Mallard, Sec, Little Sec, Log Canoe and Turquoise Lakes, and the upper Indian River - is designated for harvest, with development of primary and branch logging roads. It is unacceptable that only small buffer strips around the lakes would receive full protection. We are disappointed to see Log Canoe Creek, which flows from Log Canoe Lake into Sec Lake and has an ancient hemlock stand, surrounded on both sides by a "proposed branch road corridor". Similarly, the old red pine stand at the top of the cliff on Sec Lake is

shown as being completely within a "proposed branch road corridor". Old-growth and mature forests should not be disturbed, and larger buffers must be provided along streams, lakes and wetlands. This proposed logging road corridor abuts much of the east side of Sec Lake and south side of Mallard Lake. It would encompass the outlet creek from Sec to Mallard Lakes, a significant wetland area heavily used by waterfowl, beavers and other species of mammals and birds. It is our understanding that the abandoned, overgrown and gated logging road that starts at the Sec Lake parking area and crosses that wetland would be brought back into full service. The recommissioning of this road would not only have a significant impact on the wetland ecosystem, but Sec and Mallard Lakes have over a dozen campsites in almost constant use throughout the summer. Logging operations would negatively impact the experience of park visitors. We oppose any logging in this sector.

We feel the proposed Forest Management Plan for 2021-2031 would cause significant and irreparable harm to several key drainage systems which flow across the park and into the Ottawa River. According to the draft FMP, the upper reaches of the Indian River and McKay Creek watershed, which flows into the Muskrat River in Pembroke, would be heavily cut. Moreover, large portions of the upper reaches of the Petawawa River and Barron River drainage would also be designated for harvest - the north and south sides of Cedar Lake and Radiant Lakes, and very large area to the east of Lake Traverse are also slated for harvest. Similarly, the upper Bonnechere watershed would be heavily impacted. An exceptionally large area adjacent to Vireo Lake, the highest elevation lake in the entire Bonnechere watershed, and another large area west of Wilkins Lake, which is known to harbour wolves, including the Algonquin wolf, a species at risk - are designated as a "proposed branch road corridor". The access road from north end of Aylen Lake, which is currently blocked at the park boundary, would be brought back into service according to the draft FMP. Finally, it is our understanding that a large area adjacent to the north side of Opeongo Lake in the Madawaska drainage is designated for logging road development. Moreover, we oppose logging in the Petawawa River watershed as it is the only undammed Ontario tributary to the Ottawa River and it is known to flood. Retaining natural forest cover within the watershed is key to preventing major flooding in downstream communities. It is widely known that mature and intact coniferous forests retain snow for longer periods thus reducing the intensity of the spring run-off as the snowpack takes longer to melt. As previously stated, CPAWS-OV opposes the construction of new forest access roads within the Algonquin Park Forest and we also oppose the reopening of former logging road corridors. The existing road network is excessively extensive, and no expansions should be envisioned.

CPAWS-OV opposes the use of any chemical herbicide or pesticide, especially glyphosate, commonly known as Roundup, in the park for forest management purposes. While forest management activities are taking place in the park, we encourage the MNRF to look at other, less toxic and invasive, options for controlling pests and managing vegetation, including manual tending. Ongoing silvicultural practices should mimic natural disturbances with a view to restore a varied forest landscape reflective of the pre-industrial forests of the park with stands of various ages composed of various species of trees. The extensive management of the park's forests over the last several decades has led to a virtual

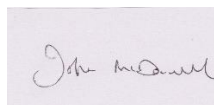
monoculture of certain species of tree which render park forests susceptible to insect depredation and other threats associated with invasive species and climate change. We also recommend that fire be considered as a management tool to reproduce natural forest succession once common in forests of the Ottawa Valley.

While logging has been exempted from the provisions of the Ontario Endangered Species Act only requiring that forest managers “minimize” harm to wildlife as opposed to actively protecting it, CPAWS-OV is of the opinion that logging, as long as it is taking place in Algonquin Park, be held to a higher standard where critical species at risk habitat is identified, monitored and ultimately protected from any form of forest management, including road building.

In closing, CPAWS-OV is concerned that the Ministry of Natural Resources and Forestry through the proposed Forest Management Plan for the 2021-2031 period is prioritizing commercial logging at the expense of the ecological integrity of Algonquin Park, in particular by providing for the construction of several kilometers of new roads, the recommissioning of former roads, logging in the headwaters of significant watersheds, in the habitat of species at risk and in proximity to campsites and popular canoe routes. We reiterate our view that industrial scale logging is incompatible with the 2006 Provincial Parks and Conservation Reserves Act and is in violation of international conservation standards the province of Ontario purports to endorse. CPAWS-OV is calling on the Government of Ontario to commit to a phasing out of all industrial logging in Algonquin Park while supporting local communities in diversifying their economies to embrace new and emerging opportunities.

For further information regarding this submission, please feel free to reach out to our office at the coordinates listed above. It would be our pleasure to work with the Government of Ontario and the Ministry of Natural Resources and Forestry to develop a plan to eliminate the scourge of logging from Ontario’s oldest and most popular provincial park.

Sincerely,



John McDonnell,

Executive Director

Canadian Parks and Wilderness Society – Ottawa Valley Chapter.

CC:

The honourable Doug Ford, Premier of Ontario,

The honourable John Yakabuski, Minister of Natural Resources and Forestry,

The honourable Lisa MacLeod, Minister of Tourism,

The honourable Jeff Yurek, Minister of Environment, Conservation and Parks,

Judith Montief Farrell, Opposition Critic for Parks,

Bonnie Lysyk, Ontario Auditor General,

Beth Cragg, Algonquin District Planner, MNRF,

### **About CPAWS Ottawa Valley**

CPAWS-OV was founded in 1969 in response to threats to the ecological integrity of Gatineau Park. The organization has grown from a small group of volunteers focused on park issues in proximity to Ottawa to a professional organization with six staff members and a highly qualified Advisory Board and over 6000 members, donors and supporters. The organization’s mandate includes advocating for parks and protected areas within the Ottawa River Watershed of Quebec and Ontario. In recent years, we succeeded in protecting over 2000 km<sup>2</sup> of the Dumoine River Watershed and adjoining areas through two new protected areas (Dumoine and Wanaki) and in 2019, we launched a new initiative aimed at protecting the Noire and Coulonge River Watersheds in Quebec’s Pontiac region thanks to a major investment from the Canada Nature Fund. In addition to our promotion of the establishment of new parks and protected areas, we also work to ensure existing parks are managed in such a way as to maintain and restore ecological integrity. To that end, we have an ongoing interest in securing legislative protection for Gatineau Park and have encouraged measures to support the conservation mandate of Algonquin Park, including mitigation measures to protect wildlife along highway 60, eliminating cottage leases and opposing industrial development within and adjacent to the park. CPAWS-OV is actively working to promote connectivity throughout our region, we are proud to have launched the Algonquin to Adirondacks (A2A) initiative and continue to support the goal of connecting two of eastern North America’s great parks. Finally, we work to connect Canadians, including children and youth, to nature through education and stewardship programs. The organization’s office is in Gatineau, Quebec.

[www.cpaws-ov-vo.org](http://www.cpaws-ov-vo.org) / [www.snapvo.org](http://www.snapvo.org)

