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Protecting Ontario's wilderness, wildlife and watersheds
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January 18th, 2021

Joe Yaraskavitch, R.P.F
Management Forester
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613-401-4167

RE: Review of proposed operations for the ten-year period of the 2021-2031 Forest Management Plan (FMP) for the Algonquin Park Forest.

Dear Mr. Yaraskavitch,

This document is the submission by Earthroots to the consultation process of Stage Three of the Algonquin Forest Management Plan - Review of the proposed operations. Specifics of the proposed operations will be addressed but Earthroots' position is that the forest management plan (FMP), as presented, violates the Provincial Parks and Conservation Reserves Act (*PPCRA*) and that puts into question the validity of the entire plan.

The Algonquin FMP operates on the assumption that lands in Algonquin Provincial Park have been subdivided into zones some of which are called "Nature Reserve," "Wilderness," and "Natural Environment" which together comprise 31% of the Park area and are protected. The bulk of the remaining lands within the Park (65%) form a matrix in which the protected zones are imbedded. This matrix is classified as a zone called "Recreation/Utilization" in which forestry operations are permitted and governed by the FMP.

Since Section 16 of the *PPCRA* specifically prohibits commercial timber harvest in Provincial Parks, the industry relies on the exemption granted for logging in Algonquin Park specified in Section 17. This Section reads:

Despite Section 16, timber may be harvested for commercial purposes in Algonquin Provincial Park in accordance with the Algonquin Forest Authority Act, the Algonquin Provincial Park Management Plan and the Crown forest Sustainability Act, 1994

This exemption appears to be sufficient to authorize commercial harvesting to occur but it does not give that harvesting activity predominance over or exemption from other obligations specified in the *PPCRA*. Quite the contrary, Section 3 of the *PPCRA* states:

The following principles shall guide all aspects of the planning and management of Ontario's system of provincial parks and conservation reserves:

- 1. Maintenance of ecological integrity shall be the first priority and the restoration of ecological integrity shall be considered.*
- 2. Opportunities for consultation shall be provided.*

Algonquin Park is a provincial park and within a park ecological integrity is the first priority which must guide all aspects of the planning and management of that park. It is unambiguous that the Algonquin FMP is legally required to demonstrate that ecological integrity is its first priority and it does not.

A well-studied established and principle of ecological integrity is that of ecosystem fragmentation or in this case, forest fragmentation. Discontinuities or disturbances that interrupt a forest landscape limit or change the movement, propagule dispersal and gene flow of species and in many other ways alter the structure and function of the ecosystem. Species-area studies have demonstrated that higher biological diversity is a function of larger ecosystem patches. Or when the landscape is already fragmented, corridors between the patches can enhance the ecological integrity and enrich the biodiversity.

Fragmentation is definitely the greatest challenge to the natural forest ecosystem of Algonquin. On Figure 1 the protected areas are highlighted in green. These protected areas are highly fragmented and functional connectivity is largely limited to narrow bands of forest along the shores of lakes and rivers. The white areas are the “Recreation/Utilization” zone in which forestry operations are permitted.

Fortunately, there are two large patches of protected forest in the park. For reference purposes I have labelled them the Lake Levielle Protected Landscape and the Burnt Island Lake Protected Landscape on Figure 1. These forests are significant in size and provide much support to the ecological integrity of the heart of the park. They are not ecologically connected by the protected area system but they undoubtedly benefit from ecological communication through the area labelled the Proulx Lake Corridor. The Proulx Lake Corridor is constrained by Lake Opeongo to the south and Lac la Muir/Hogan Lake to the north. There has been much logging activity in recent years on adjacent lands, but the core area of the Proulx Lake Corridor was not in the 2010-2020 harvest plan. The corridor forest is still intact and performing its ecological functions.



Figure 1: The Proulx Lake Corridor connects protected landscapes in Algonquin Provincial Park.

However, the proposed operations of the FMP under review schedule the entire Proulx Lake Corridor for harvest in the 2021-2031 period. This key corridor ecologically connecting the functional centre of the natural area of the park will be disrupted, yet the RMP is completely insensitive to the implications on the ecological integrity of the natural processes while operate at landscape scale.

The Recreation/Utilization Zone is not a *carte blanche* to pretend that activity on the lands are no longer constrained by the *PPCRA*. All lands within the Park boundaries are bound by Section 3 to the priority of maintaining ecological integrity. The Proulx Lake Corridor is a key Park value that must not be subjected to harvesting, and we ask that it be removed from the FMP.

Sincerely,

Gord Miller
Chair, Earthroots

cc Honourable Jeff Yurek, Minister of the Environment, Conservation and Parks
Honourable John Yakabuski, Minister of Natural Resources and Forestry