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Re: Review of Proposed Operations Algonquin Park Forest 2021 – 2031 Forest Management Plan

Dear All,

Thank you for the opportunity to comment on the Proposed Operations for 2021-2031. As you know, Wildlands League has a long-standing commitment to ending logging in Algonquin Park, being originally founded with that goal. You will find our comments follow a familiar theme.

We are calling on Ontario to:

- End logging in Algonquin Park.
- Immediately suspend logging of the old growth
- Reforest the more than 5,000 km of logging roads

We have been calling for an end to logging in Algonquin since 1968. The imperative to do so has only increased with time. Humans are:

- In the midst of catastrophic global climate change and related severe weather events,
- Witnessing a massive extinction of biodiversity world-wide,
- In the midst of a pandemic born out of disrespecting the natural world and driving us to seek refuge in nature with increasing numbers,
- Increasing our understanding of the negative ecological impacts of industrial logging and road-building on carbon storage and species,
- In need of more spaces where they can reconnect with nature,



- Seeing some governments, like Ontario, rolling back protections on forests and species at precisely the wrong time and reducing sustainability of forestry even further.

And nature is the solution.

There is also optimism.

- Canada has committed to 25 % protection of land and inland waters by 2025 and 30% protection by 2030.
- Science recognizes that nature can provide up to 30% of the solution to climate change and the majority of the biodiversity solution.
- Old forests, like those that still exist in parts of Algonquin store more carbon and can be better sponges for floods and droughts.
- The Lightening the Footprint Report¹ recommendations, if fully implemented could add more than 100,000 ha of protection to Algonquin immediately with no loss of wood supply. This reflects the 29% of the area off limits to logging that are still included in the Recreation/Utilization Zone, not in the protection zones.
- The 2020 Ontario Auditor General's report² has called for enhancing ecological integrity of Algonquin by expanding protection through a review of the current level of logging on ecological integrity and amending the Algonquin Park Management Plan accordingly.

These impacts and opportunities highlight the need to end logging in Algonquin now more than ever. Our more detailed comments follow.

We are happy to discuss any questions or comments that you may have about our submission.

Sincerely,

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¹ Joint Proposal for Lightening the Ecological Footprint of Logging in Algonquin Park. Ontario Parks Board and Algonquin Forestry Authority Board of Directors. 2009.

² Office of the Auditor General of Ontario, Conserving the Natural Environment with Protected Areas. November 2020

Wildlands believes the park system should maintain and anchor ecological values in Ontario and this is done by requiring all parks be managed for ecological integrity. This is reflected in the *Provincial Parks and Conservation Reserve Act, 2006* (PPCRA) where maintenance and restoration of ecological integrity is the purpose and management priority for all protected areas regulated under the PPCRA. Sustainable forestry requires having large protected areas to act as benchmarks so as to compare logged forests with those that aren't. Algonquin has been so heavily roaded and logged that it may be little different from other industrial forests.

It means we've lost our benchmark.

As such we do not regard Forestry as an appropriate activity for Algonquin.

We've been calling for an end to logging in Algonquin for over 50 years. If our call had been taken seriously by government and industry, we would have had decades to plan and execute the transition. Now, in an era of climate crisis and biodiversity emergency, there is an imperative for immediate action.

Canada has committed to increasing Canada's protected lands and fresh water to 25% by 2025 and 30% protection by 2030, including providing funds and coordination to make this happen.

A fuller realization of the Lightening the Footprint vision by immediately expanding protection to include all the areas off limits to logging in the Recreation/Utilization Zone would add substantially to the total of protection and would have no wood supply impacts. Algonquin Park should therefore be expanding protection for species, old growth and a more climate resilient forest.

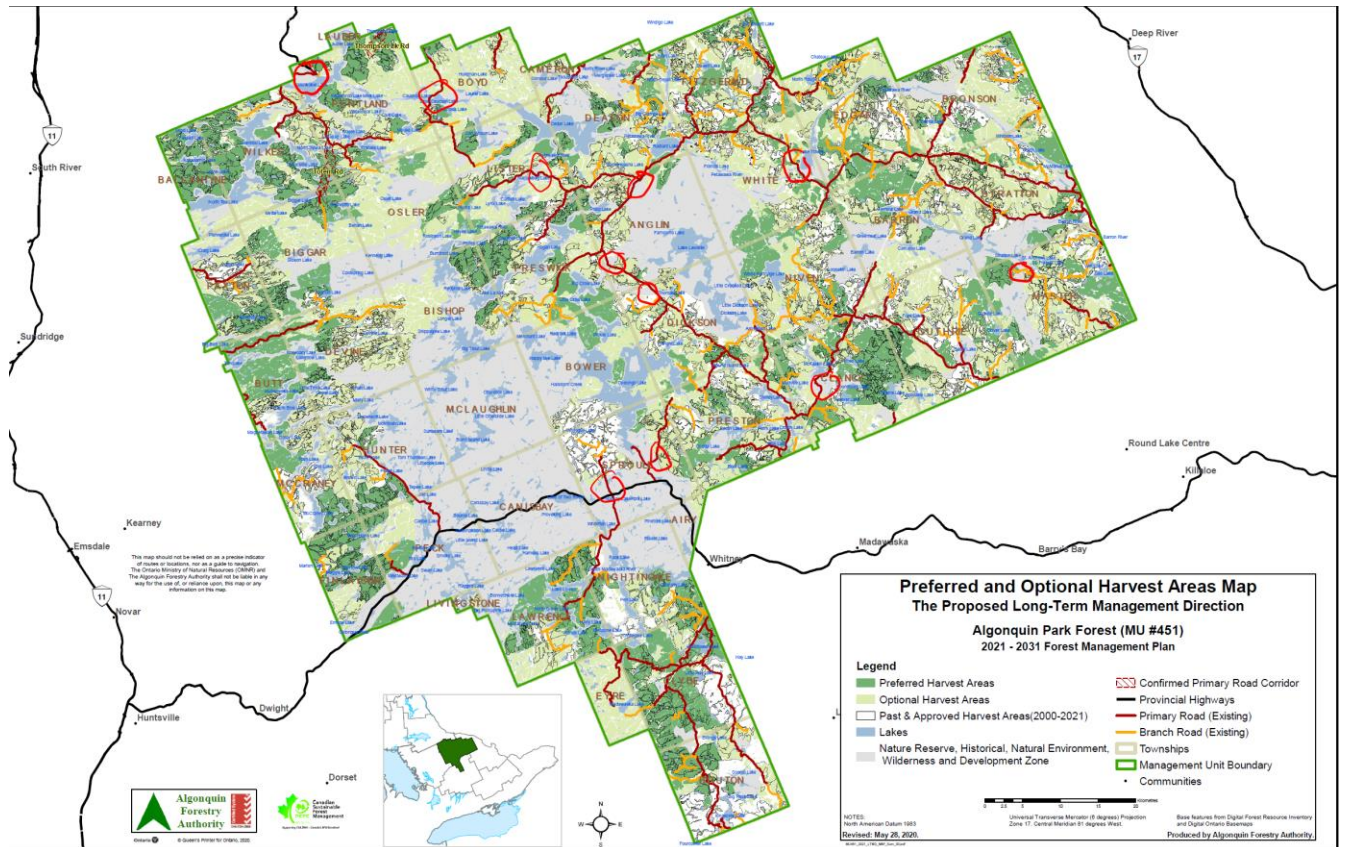
We have always recognized that removing logging from Algonquin would require a managed and thoughtful detailed process to have the best ecological and economic outcomes. Therefore, we have been a supporter of the Lightening the Footprint (LTF) concept from its beginning. The idea of increasing protection in Algonquin while maintaining current wood flows to area mills is a good step toward ending logging in the Park. This forest management plan public participation is an opportunity to help with this goal and not preclude conservation opportunities before they can be realized, so that Algonquin Park can function as a protected area and ecological integrity can be restored.

Commenting on this Forest Management plan **in no way implies that we condone logging in Algonquin.**

Despite the promise of LTF, to our dismay the limited provisions that have been adopted to date appear inadequate. Over 100,000 ha was designated to be removed from logging under the 2013 Park Management Plan Amendment to incorporate LTF, but Ontario still allows road building and aggregate pits there. Algonquin has amongst the highest concentrations of natural Brook Trout lakes in the world. This irreplaceable legacy of millennia is at risk, yet Ontario still allows roads and gravel pits in Brook Trout Areas of Concern.

In the Long-Term Management Direction Preferred and Optional Harvest Areas Map, we have identified 11 areas where forestry roads cross protected zones and other areas off limits to logging within the park. See the circled red areas below. This is possibly an under-estimate as the map does not include operational roads and also because of the resolution of the map. We

have not included roads that are used as access points although some of these cross protected zones and are also used for logging.



Some of these roads predated LTF and some existing roads cross protected zones that also predate LTF. No matter how you look at it, **the underlying story is that the protected zones within Algonquin do not exclude the impacts of roads and their construction.**

As we have argued repeatedly, road building has perhaps the greatest impact of all logging activities in proportion to the area devoted to it through:

- deforestation
- increased risk of facilitating illegal access and subsequent abuse of irreplaceable resources (like self-sustaining brook trout lakes),
- increasing avenues for invasive species and predators, risking a change to native species composition with the most vulnerable species losing out,
- direct impacts to species at risk like the turtles through roadkill and illegal collection,
- soil compaction and erosion and,

- habitat fragmentation

OMNRF's own commissioned report³ details the impacts of roads:

- Areas without roads have higher levels of native diversity and fewer invasive species.
- Roads can end up Blocking fish passage, damaging fish habitat
- Roads can lead to increased exploitation of fish. They can alter hydrology and groundwater recharge and discharge (upwelling springs in lakes are essential for brook trout spawning.)
- Sediment and water nutrient loading can have impacts 4 km from the point source. Small buffers (30-120 m) are far too narrow.
- Roads fragment habitat for interior forest bird species especially, increasing the amount of edge habitat. They can limit movement between habitats. Mammals, reptiles and amphibians can be impacted as far as 2km from roads.
- Roads can subsidize populations of generalist predators, with road-killed carrion and garbage and facilitating movement. These common predators then are increased threats to songbird populations.

Roads are essentially permanent in Algonquin, reused at least every few decades. The 5487 km of road with a minimum right of way of 9m means that almost 5,000 ha are permanently deforested, and will not be storing carbon when we need it most. This results in a minimum current loss of 1 million tonnes of stored carbon based on an estimate of southern Ontario forests storing 200 tonnes per ha⁴.

The Algonquin Dome is high and cold enough to be a climate refuge for species. The majestic eastern hemlock is falling victim to an invasive insect elsewhere. The woolly hemlock adelgid is listed as is the greatest threat to hemlock in eastern North America by the US Forest Service. Algonquin is still cold enough to prevent the adelgid from attacking hemlocks there. Despite this, hemlock is still targeted for logging and over 14,000 cubic metres were harvested in 2018-2019.

But there are immediate opportunities to expand protection. Less than ½ the total allotted forest has been harvested over the last 10 years. This means that there is a lot of additional land (beyond that identified under LTF) that does not need to be harvested to fill existing wood demand. These areas could be identified and immediately set aside for protection as part of a plan to move logging outside of the park.

These impacts and opportunities highlight the need to change direction drastically on forest management in Algonquin. To do this, the FMP must:

³ Algonquin Cottage Lease Background Report Literature Review. Ontario Ministry of Natural Resources. January 2013.

⁴ Colombo, S.J., J. Chen and M.T. Ter-Mikaelian. Carbon Storage in Ontario's Forests, 2000-2100. Climate Change Research Information Note Number 6, 2007. Ontario Applied Research and Development Branch.

- Reflect the priority of managing for Ecological Integrity in Algonquin (notwithstanding the existence of logging). The FMP process and Park Management Planning should work together to address the question of how the Park can maintain and enhance EI as required by law while phasing out forest operations over time. Maintenance and restoration of ecological integrity is the purpose and management priority for all protected areas regulated under the Provincial Parks and Conservation Reserves Act, 2006, including Algonquin.
- Respect the spirit and intent of Lightening the Footprint (the Joint Proposal for Lightening the Ecological Footprint of Logging in Algonquin Park). Industrial activities including logging, road building/maintenance and aggregate extraction should not occur in any Protection zone, including Natural Environment Protection Zones, Brook Trout Areas of Concern or in any areas unavailable for logging in the Recreation Utilization Zone. Removing areas from logging but still allowing them to be roaded does not lighten the footprint in Algonquin, it merely perpetuates industrial activities in a park under a different name. On the other hand, truly increasing protection in Algonquin by restoring and stopping roads would clearly be positive for the Ecological Integrity (EI) of the Park. The plan put forward under Lightening the Footprint would see no loss of wood supply to mills.
- Confirm the remaining unaccessed old growth stands in Algonquin such as those identified by Ancient Forest Ecosystem and Research (AFER) <https://savealgonquinoxldgrowth.org/maps> and avoid industrial activity in them. According to AFER, Algonquin contains 40% of the old forests (>150 years old) in central Ontario while taking up just 4% of the land area. AFER has identified remaining old growth stands from the Forest Resource Inventory, representing 24,000 ha. <http://www.ancientforest.org/algonquin/>. Although the FMP does have targets to maintain a certain level of old growth of different forest types, it plans to log many of these stands, which will diminish much of their ecological function. Old growth forests can ameliorate extreme conditions like floods and droughts better than younger forests, provide unique habitats and there is abundant evidence that they store more carbon than younger forests. See for example <https://e360.yale.edu/features/why-keeping-mature-forests-intact-is-key-to-the-climate-fight>. With adept planning and consultation, it is possible many of these areas could be protected without sacrificing wood supply, similar to Lightening the Footprint.
- Adopt forestry practices that reduce compaction, layers of smothering slash and loss of productive forest land. Wildlands League has recently reported on the impacts of full tree harvesting in the boreal forest of NW Ontario (see <https://loggingcars.ca/report/>). To the extent that similar practices occur in Algonquin, there is a high probability that they have similar negative consequences. Even the predominant single tree selection logging system in Algonquin relies on landings, roads, and aggregate pits, all of which lead to forest loss, degradation and delayed regeneration. Over 5,000 km of logging roads criss-cross the park. With a majority being reused every 20-30 years, they are effectively permanent. This has negative impacts on carbon storage, hydrology and some wildlife species. The FMP should focus on avoiding forest cover loss and restoring roads and other degraded areas to natural forest cover.



- Help protect and recover species at risk and their habitat according to the Endangered Species Act (2007) and not merely mitigate damage as required under the CFSA.
- Adhere to requirements under the Environmental Assessment Act (EAA) and not be exempt from the rigours of this act.

While exemptions to the ESA and EAA have recently been imposed by the current provincial government, we urge the managers of Algonquin Park to operate as though they were still in effect. We believe these exemptions to be irresponsible and limit the ability of the public to be consulted and provide input. They remove the ability of the government to consider the impacts of environmental changes imposed by development and develop alternative approaches.

Finally, we recommend forestry planning be completed that examines the process and timeline for moving logging outside the park as soon as possible.