



WILDLANDS LEAGUE

A chapter of the Canadian Parks and Wilderness Society

February 26, 2010

Paul Gelok
Algonquin Provincial Park
Highway 60, East Gate Complex
PO Box 219
Whitney, Ontario
K0J 2M0

Sent Via Email

Algonquin Provincial Park Management Plan Amendment
EBR Registry Number 010-8824

Dear Mr. Gelok,

We are very pleased that the expansion of protection in Algonquin Provincial Park is moving forward as a result of the *Joint Proposal for Lightening the Ecological Footprint of Logging in Algonquin Park*, Revised October 26, 2009 (LTF). More protection for Algonquin helps move it closer to alignment with all other protected areas which are free from industrial uses. We understand that the intent of this Management Plan Amendment is to increase protection to 49% of the park. Of course this will be followed by a corresponding Forest Management Plan Amendment.

Wildlands League has been instrumental in all of the protection expansions in the park since 1968, including LTF. The *Provincial Parks and Conservation Reserves Act (PPCRA)* clearly prohibits logging in all of our more than 600 protected areas, with the exception of our first – Algonquin. With over 90% of Ontario open to development, it is critical that we manage our protected areas in a way that truly protects their ecological integrity. We believe that more protection for Algonquin now helps move it closer to alignment with all of our other protected areas which are free from industrial uses.

We are very encouraged that this process is moving forward, but believe clarification of some of the protection is critical to ensuring implementation fulfils the intent.

1 - Zoning: Is all of the increase truly protected?

While the intent of the report is to increase protection in the park to 49% of the land, it is unclear why the proposal suggests that part of this protection must remain in the 'Recreation Utilization' (RU) Zone, a designation that continues to be used to manage land for forestry (logging) purposes.

RU Zone: exists only in Algonquin and only to facilitate forestry activities.

Protected – Zoned (outside of the RU Zone) does not permit forestry.

This is further complicated by some ambiguous language used to describe areas that are protected from forestry.

To ensure that land is truly protected, all areas designated 'protected/not available' (for forestry) in the park, must be designated 'Protected Zoned' and not RU as is currently proposed. The confusion around

this issue arises from the chart in “Summary of Current and Proposed Areas for Protection” (Figure 1, page 20) of the joint LTF report.

*Joint Proposal for Lightening the Ecological Footprint of Logging in Algonquin Park
As it currently exists (summarized)*

	Current Ha.	% of Park Area	(LTF) Proposed Ha.	(LTF) % of Park Area
Total Protection Zone	167,544	22%	265,746	35%
Total Protected/Not Available R/U Zone	173,951	23%	105,493	14%
Total Protected/Not Available	341,495	45%	371,238	49%
Available for Forest Management	421,386	55%	391,643	51%
Total Park Area	763,554	100%	763,554	100%

*Joint Proposal for Lightening the Ecological Footprint of Logging in Algonquin Park
As it should exist in order to clarify protection*

	Current Ha.	% of Park Area	Clarified Version Ha.	Clarified Version % of Park Area
Total Protection Zone	167,544	22%	371,238	49%
Total Protected/Not Available R/U Zone	173,951	23%	0	0%
Total Protected/Not Available	341,495	45%	371,238	49%
Available for Forest Management	421,386	55%	391,643	51%
Total Park Area	763,554	100%	763,554	100%

The province has committed to protecting 49% of Algonquin, but it remains unclear why the zoning does not follow suit. Keeping any of the protected land in the RU zone questions the value of any protection this zone affords. There is no reason to continue to use the RU designation once land is **not available** for forestry.

2 – Roads – Reduce the amount and impact of roads on the Park

The road network needed to facilitate logging has significant negative impacts on the ecological integrity of the park. At more than 5,400 kilometres of roads¹ the impacts include, but are not limited to:

- Erosion
- Soil compaction
- Habitat destruction and disturbance

¹ In comparison the city of Toronto has approximately 5,300 kilometres while the road distance between Vancouver to Halifax is 5,961 kilometres

Disruption of predator/prey relationships
Increases in heat, dust and noise
Increase in consumptive uses (more hunting and fishing pressure)
Habitat fragmentation

While increasing protection in Algonquin through LTF we must also reduce the impacts of roads in the park. Total road length must continue to diminish. Less aggregate must be mined and used on park roads. Furthermore, decommissioning of roads must occur after harvesting has been completed in an area.

3 – Old Growth – All Old Growth stands must be protected in Algonquin

While LTF proposes to protect more of Algonquin Provincial Park, it is unclear whether all of the existing Old Growth stands will indeed be captured by this process. Every effort must be made to ensure that all identified Old Growth is protected as a result of this process.

In summary, the province has shown considerable foresight through LTF by increasing protection in Algonquin. In order to be sure that the 49% is truly protected we must ensure that:

1 – Zoning – Is all of the increase truly protected?

2 – Roads – Reduce the amount and impact of roads on the Park

3 – Old Growth – All Old Growth stands must be protected in Algonquin

We look forward to working with you to ensure 49% of Algonquin is truly protected.

Sincerely,



Evan Ferrari
Director, Parks and Protected Areas Program
CPAWS Wildlands League

cc: -Honourable Michael Gravelle, Minister of Northern Development Mines and Forestry
-Gord Miller, Environmental Commissioner of Ontario