

Ms Dorothy Shaver
District Planner
Ministry of Natural Resources
7 Bay Street
Parry Sound, ON
P2A1S4

RE: Lightening the Ecological Footprint of Logging in Algonquin Provincial Park.
EBR Registry Number: 010-0445

Dear Ms Shaver;

Following are Algonquin Eco Watch comments regarding the Ontario Parks Board of Directors recommendations concerning the above.

In general, we welcome this document and congratulate the Board on their detailed treatment of this issue. Since you will undoubtedly receive many submissions from the public regarding this topic, Algonquin Eco Watch has decided to confine our comments to 2 main topics; namely old growth and hydrogeological issues.

We are concerned that insufficient provision of old growth under the current uniform shelterwood method of pine management will result in a total loss of old growth pine in the managed portion of eastern Algonquin Park through time. The Algonquin Forestry Authority feels justified in assuming that sufficient old growth will occur in protected areas within the Park to meet provincial requirements. We feel that this will "lump" old growth into one or two small areas and result in large areas of managed forest that are totally lacking in this critical component of a well-balanced and sustainable ecosystem. We believe that evenly distributed old growth stands must be provided throughout the entire managed forest, in the best interests of wildlife species that are dependent on those age classes. Algonquin Eco Watch commissioned a consulting firm to conduct an objective study of this problem and a copy is enclosed. Additional copies are available upon request. While the Board's recommendations do mention old growth, it is mainly in general terms and because the majority of protected areas are riparian-related, large areas of upland habitat will remain without adequate representation of old growth. We would welcome the opportunity of working with the Board to correct this.

We congratulate the Board on its recognition of the significance of Algonquin's self-sustaining brook trout waters. We feel however, that more meaningful protection could be provided in the following manner. Rather than imposing pre-set AOC's around brook trout lakes and streams, we feel that protection should be provided around entire sub-catchment and catchment basins. This is the only way to ensure that ground water and surface water flows will remain constant into the future. While this would probably increase the area of protection in many/most instances, it may reduce it in others, and it would ensure that each lake and stream is treated individually. Aggregate extraction is closely related to ground water and the water table, especially when near or adjacent to brook trout waters. Removal of aggregate is non-sustainable and can lower the water table, disturbing the delicate balance that provides source water to upwellings, seeps and nursery creeks, three critical factors upon which the successful brook trout reproductive cycle depends. Algonquin Eco Watch recommends that a robust program of aggregate pit certification be introduced into this proposal. Certification could include the placement of test wells in larger pits and comprehensive surveying of all pit proposals to ensure that they do not fall within the sub-catchment or catchment basins of brook trout (and potential or historic brook trout) creeks, rivers and lakes. Again, Algonquin Eco Watch would welcome the opportunity to work with the Board in this regard.

Yours very truly,

A handwritten signature in black ink, appearing to read "Mike L. Wilton". The signature is fluid and cursive, with a large initial "M" and a long, sweeping tail.

Mike L. Wilton,
Director