

A Request for Review of the Forest Management Planning Manual, 2009

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Declaration of Ontario Residency:

I David Euler am an Ontario resident and have been since August 1973 (Month, Year)

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Declaration of Ontario Residency:

I Mike Wilton am an Ontario resident and have been since _____ (Month, Year)

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I (a) We request a review by the Ministry of Natural Resources of an existing policy, The Forest Management Planning Manual, 2009

The Forest Management Planning Manual, 2009 (“the Manual”) was approved on December 9, 2009

A link to the final document is provided (2.3 MB):

http://www.web2.mnr.gov.on.ca/mnr/forests/public/publications/fmpm/entire_FMPM.pdf

2. We believe that the Ministry of Natural Resources should undertake this Review to protect the environment because the determination of sustainability set out in the Manual is flawed and based on circular logic. We contend that 1) the determination of sustainability in the Manual is circular and that no objective analysis of targets is required and 2) by removing the requirement to calculate the Natural Benchmark, the outcomes reported are not tied to an objective reality and, consequently, do not reflect sustainability. Under the Manual, the mere achievement of objectives that have not been shown to validly relate to sustainability would be determinative of sustainability. As well, removing the requirement to calculate the Natural Benchmark will make it difficult for the public to participate in developing a Forest Management Plan.

The Determination of Sustainability in the Manual is Circular

The problem with the determination of sustainability in the Manual is that it is circular (see page B-38 of the Manual, and the quote listed below). The final conclusion about sustainability is determined by the nature of the objectives established by the Planning Team. Planners can set the timber harvest targets at a high level, and set low targets for biodiversity and wildlife habitat, and if these objectives are achieved, the plan is considered sustainable. There is no objective analysis of the targets themselves to ascertain if the forest will be sustained when the targets are met. The conclusion that the plan is sustainable is established when the targets are selected, because the assumption from the beginning is that the targets are sustainable. This is circular reasoning and needs to be changed. Figure 1 (Adaptive Management Cycle) on page iii of the 2009 Manual illustrates how the process works and demonstrates the circularity of the reasoning. The text box on the right side of Figure 1 contains the following quote- “Determination of Sustainability: based on predicted levels of objective achievement.” This quote captures the essential nature of the problem, that no matter what targets are established, if these are achieved, the plan will be declared sustainable.

The Manual is the foundation document that provides direction for all aspects of Ontario’s forest management planning. In order to avoid the consequences of the Manual’s (flawed) circular reasoning approach, an independent assessment of the validity of sustainability targets is required.

At the end of the planning period, if a Forest Management Plan is truly sustainable, it should have a similar level of biodiversity as was present at the beginning, approximately the same volume of timber that could be harvested, and a similar amount of wildlife habitat as at the start of the plan. Without an independent assessment of these parameters, the declaration of sustainability in the 2009 Planning Manual is not valid.

The following quote from the Planning Manual 2009 illustrates the problem (page B-38)

“The plan text will contain a conclusion on forest sustainability and include documentation as to how the forest management plan has regard for plant life, animal life, water, soil, air, and social and economic values, including recreational values and heritage values (Part A, Section 1.3.10). The conclusion will be based on the assessment of objective achievement, the spatial assessment, the social and economic assessment (Part A, Section 1.2.5.2) and prescriptions for the protection of values.

The documentation of the determination of sustainability will:

(a) Describe how the forest management plan provides for the sustainability of the Crown forest on the management unit, and discuss:

(i) The collective achievement of management objectives, and provide Rationale for any management objectives for which targets and/or Desirable levels are not achieved;

(ii) The preliminary spatial assessment; and

(iii) The social and economic assessment; and

(b) Provide a conclusion that the forest management plan has provided for the Sustainability of the Crown forest.”

Elimination of the Natural Benchmark Run

In previous versions of the Forest Management Planning Manual, the plan author was required to calculate a “Natural Benchmark”. This Benchmark was intended to illustrate how the forest would evolve in the absence of human management. Because the Crown Forest Sustainability Act, 1994 (CFSA) is based on the idea that forest management should mimic natural disturbances, the “Natural Benchmark” approach gave everyone a standard to compare against the proposed forest management plan. The “Natural Benchmark” was especially important to the Local Citizens Committee (LCC), who usually do not have knowledge about the technical details of forest management, but can understand the comparison between the Benchmark and the proposed forest management plan.

Unfortunately, in the 2009 manual, the requirement to establish a “Natural Benchmark” as a standard against which to compare to the planned management approach has been eliminated. This is a major methodological error, because it will not be possible to compare the results under the management plan with the natural evolution of the forest (which should serve as the benchmark, or control population). This removes a major tool for determining sustainability and, ultimately, whether the mandate of the *Crown Forest Sustainability Act, 1994* (CFSA) has been met.

In the Manual, Table FMP-6 (see page B-72 for a sample Table FMP-6) simply requires planners to list objectives for wildlife habitat. However, no comparison is available to illustrate how much habitat would be available if the forest evolved naturally, in the absence of human management. Consequently, any target is acceptable, and achieving that target constitutes sustainability. Under the 2009 Manual, it will be possible to set wildlife habitat targets without reference to how much habitat would be available in a forest unmanaged by humans.

The Manual should be modified and used to estimate the amount of wildlife habitat that would be available in a forest influenced only by natural events, i.e. the Natural Benchmark. Estimates of wildlife habitat available in the unmanaged forest could be tracked and compared to the habitat

available in the management plan. This would be a useful approach to sustainability, and would have credibility.

- 3. The following is a summary of the evidence that supports my Application For Review. (For example, scientific studies and reports. Attach copies of written materials and photographs to this Application. Reference each document and photograph against the list you have created and reference them with this number — #3.)**
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Evidence to support this application is contained in two Appendices attached to this Request.

Appendix I is a copy of a letter that was sent to the Ministry of Natural Resources in response to an Environment Bill of Rights Posting (010-5349). The letter contained two of the three concerns in this Request and was supported by the Environmental Non-Government Organizations (ENGO) listed at the end of the letter. The Ministry of Natural Resources response to the letter can be found in the EBR (010-5349).

Appendix II is a summary of the concerns that have occurred as the Management Plan for Algonquin Park was developed and approved.

Although the Forest Management Plan for Algonquin Park was prepared under the 2004 Planning Manual. The Determination of Sustainability in the 2004 Manual is the same as the revised 2009 manual. The Algonquin Forest Management Plan is a good example of how the Plan Authors have prepared a Forest Management Plan that is not sustainability using the circular definition of sustainability continued in both the 2004 and 2009 Planning Manuals.

The Algonquin Plan also demonstrates just how important calculating the Natural Benchmark is to the public and the Local Citizens Committee and to building a sustainable plan that provides a variety of benefits to people while retaining the health of the forest.