

This is Annex 4 prepared by Algonquin Eco Watch as part of a request for Individual Environmental Assessment for the Algonquin Forest Management Plan 2010

## **1.0 Annex 4- Setting Unsustainable Objectives**

Establishing ecological targets is the perfect opportunity for the Ministry, the AFA and the LCC to work together to develop the best targets with input from local people and professional foresters and biologists. Unfortunately, in this case, the Planning Team imposed the ecological targets on the Plan with little discussion at the LCC.

The Plan calls for a major effort to maintain the harvest of wood at the highest level possible, while reducing wildlife habitat and diversity to lower levels. The plan intends to harvest on 91% of the available harvest area and take 89% of the harvest volume available. In sharp contrast, the Plan allows old growth and wildlife values to decline to 75% of the natural level that would occur without forest management.

### ***Technical Discussion***

In our discussion with the Planning Team, Algonquin Eco Watch commented that there was no attempt to explain why 75% of the natural amount of habitat for wildlife and other non-timber values was used. Why not 80% or 90% or 100%? We regard this value as too low in most cases and will be detrimental to the overall health and sustainability of the forest and the wildlife that live in that forest. We do not agree that this is an acceptable value.”

In response to this concern Joe Yaraskavitch of the MNR explained that:

“Aiming for 75% of the natural benchmark trend by model term was determined by the planning team to be an acceptable balance between industrial wood supply, social and ecological targets. This was well explained at the recent LCC meeting. The scoping analysis was conducted to assess the impacts of various levels ecological objectives and understand the trade-offs. We will ensure that the FMP contains more detail as to why this was chosen. We do not agree with your statement that this will be detrimental; in fact we feel the opposite.”

We reviewed the minutes from the LCC meeting referred to by Joe and did not find the rationale clearly explained:

The relevant excerpt from Jan 9, 2009 LCC minutes is:

Scoping analysis compared setting ecological targets at 75% and 100% of the natural benchmark (NB) levels; the planning team decided to set the target of 75% of the NB level for all terms for most species/items to balance wood and habitat supply. Using 75% of NB run instead of past standard of 20% below lowest inflection point of NB provides for

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a greater area of preferred habitat for species and higher levels of old growth than ever before and mimics the natural trend over time. Actual levels achieved are often higher than the targeted 75% level but the target has been maintained consistently at 75%.

After reviewing the minutes and graphs of wildlife habitat presented in the Analysis Package we find no reason to modify our belief that the 75% level has been chosen arbitrarily and there is no scientifically valid reason why it could not be 80% or 120%. Furthermore, it is not apparent that the 75% approach is an improvement over the “20% below the lower inflection point” approach as the 75% does not always provide for a greater area of preferred habitat, in fact it sometimes provides for less. A careful look at the wildlife graphs reveals that the “20% rule” provides more habitat for Blackburnian Warbler, Bay-breasted Warbler and Broad Winged Hawk, but for virtually all other species listed, there is very little difference between the two rules.

Given the importance of the bounds of acceptable habitat used in the SFMM modeling, we believe it is incumbent on the planning team to provide a sound objective basis for rationalizing its decision to use the 75% level (or any other level). The rationale provided to date to explain the 75% rule only explains that it was “determined by the planning team to be an acceptable balance”; explanation of the scientific merit of the approach has not been provided.

### **A Better Approach**

Algonquin Eco Watch suggests that a balanced approach to planning would be to have the planned harvest level and the ecological targets set at the same percentage of the available harvest area and natural benchmark run levels, respectively. This could result, for example, in a planned harvest equal to 85% of the available harvest area and ecological targets equal to 85% of the natural benchmark levels in each period.