

May 28, 2010

Ms Agatha Garcia-Wright, Director
Environmental Assessment and Approvals Branch
Ministry of the Environment
2 St. Clair Ave. West
Toronto, Ontario
M4V 1L5

Dear Ms Garcia-Wright:

Re: Algonquin Park Forest Management Plan

We are writing as Directors of Algonquin Eco Watch to ask you to initiate an Individual Environmental Assessment for the Algonquin Park Forest Management Plan 2010, as permitted in Section 3.4.2 of the Forest Management Planning Manual for Ontario's Crown Forests, June 2004.

Algonquin Eco Watch has participated in the development of the Algonquin Park 2010 FMP as members of the Local Citizens' Committee, and we have appreciated the opportunity to discuss issues and perspectives with the members of the Planning Team. However, we have several significant concerns regarding key aspects of the plan that we have been unable to resolve in discussions with the plan author or Ontario Ministry of Natural Resources (OMNR) management. Because Algonquin Park is the only Park in Ontario where logging is permitted, the Forest Management Plan should reflect the very best forest management plans in Ontario and elsewhere.

If the 2010 Plan is implemented, wildlife habitat will be degraded, old growth stands in both the white pine and hemlock areas will be reduced and the natural character of the Park will be more reflective of an industrial forest than a Park. This is truly tragic when the initial purpose of the establishing the Park in 1893 was to provide a place where wildlife could exist and people could rest and be rejuvenated in a natural setting. We do not oppose logging in the Park, but we believe that the logging plans should meet the highest standards of modern forestry. Modern forestry is capable of harvesting trees, protecting wildlife habitat and providing opportunities for human recreation, if it is well-planned and is based on the latest ecological understanding of forest ecosystems. Good forest management plans can be produced; however, unfortunately the 2010 Forest Management Plan for Algonquin Park is not one of those.

The annexes to this letter contain the details of our concerns. We have discussed these concerns at length with the Plan Author and senior Ministry of Natural Resources staff. In general, we have found that staff of both the Algonquin Forestry Authority (AFA) and the OMNR have dismissed our concerns without rigorous analysis. Instead, we feel that they have treated us as though we are trying to advance frivolous arguments merely to be obstructionist. As well, the issue resolution process has been very disappointing. Neither the

District Manager nor the Regional Director made a serious attempt to actually resolve the issues. In each case, they called a meeting, asked their staff to attend, and then had them prepare an argument to illustrate that we were wrong. The point of their response to our concerns was to tell us that we were wrong, and there was no need to make any changes. There was little substantive discussion of the issues at either meeting.

We both have considerable experience in forestry and wildlife management. I, David Euler, retired as Dean of the Faculty of Forestry and the Forest Environment at Lakehead University in 2001, after a long career in wildlife and forest management. Mike Wilton worked as a wildlife biologist for more than 35 years in and around Algonquin Park. The purpose of our objection to the Forest Management Plan is not merely to cause problems. Rather, we want to contribute to better forestry in Algonquin Park and we hope you will assist us in that endeavour.

There should be no objection to an Individual Environmental assessment by people who are not employed by the OMNR or the AFA, but who have expertise in forestry and wildlife management. If our concerns are justified by this review, there should be no objection to making changes in the Plan. On the other hand, if the review illustrates that we are wrong and that the Plan is sustainable, we will rejoice in that we can accept that the Plan is the best available.

We welcome an opportunity to discuss this entire matter with you and will be pleased to come to Toronto to speak with you in person and to illustrate our concerns in Algonquin Park.

Sincerely,

David Euler
Box 6, Site 4, RR #4
Echo Bay, Ontario
P0S 1C0 705 248 1494

Mike Wilton
RR #1
Spring Bay, Ontario
P0P 2B0 705 377 5072

Enclosures:

Annex 1- What Makes Algonquin Park Special

Annex 2- Flawed models are used in writing the Plan.

Annex 3- Losing Old Growth Stands in the Park

Annex 4- Setting Unsustainable Objectives

Annex 5- The Tragedy of Hemlock Management in the Park

Annex 6- Correspondence Naylor-Euler