

# **Comments to the 2010-2020 Algonquin Park Forest Management Plan**

**Submitted by ...  
Algonquin Backcountry Recreationalists (ABR)  
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## **Billy Lake Road**

### **Billy Lake Road Alternative 1**

Alternative 1 parallels the Booth Lake, McCarthy Creek, Mole Lake, Godda Lake canoe route. This alternative's truck traffic would affect this canoe route by acoustic impact. It would also affect the canoe route by physical and visible dust-cloud impacts.

Alternative 1 runs immediately along the south side of McCarthy Creek's N13 Nature Reserve Zone ("Booth Lake Bog"). McCarthy Creek is explored by many recreationalists on day-trips from campsites on Booth Lake. This alternative's truck traffic would affect the creek area by acoustic impact. It would also affect the creek area by physical and visible dust-cloud impacts.

Alternative 1, as well as crossing the Mole/Boot Lake canoe route portage, also parallels the Mole/Boot Lake canoe route portage within 35 meters for a considerable distance, which is unacceptably within the 60 meter setback specified by the Algonquin Provincial Park Management Plan Section 9.2.1 (page 42).

Alternative 1 would be contrary to The Forest Management Access Roads Strategy for the Algonquin Park Forest, which indicates in Section 4.2 Social (page 7) ...

"Road activity in the park needs to be managed to protect scenic quality, solitude and wilderness-like recreational opportunities, all of which are values that park visitors seek to experience. The separation in time and place of forest operations and recreational activity has been used over the past thirty years. However, due to increasing visitation and changing visitor distribution patterns at perimeter/interior access points, noise standards and hauling routes will need further analysis and may require some modifications to manage potential conflicts. ..."

Alternative 1 would also be contrary to The Forest Management Access Roads Strategy for the Algonquin Park Forest, which indicates in Section 7.2 Forest Access Management (FAM) Areas (page 11) ...

"Park values such as waterways, portages, hiking trails, boundaries of other zones (i.e. Wilderness, Nature Reserves) and Park boundary, assist in defining FAM Areas. In effect, each Area is intended to be separate and distinct from other Areas."

The Algonquin Backcountry Recreationalists consider Alternative 1 to be undesirable for the above reasons.

Should the 2010-2020 Algonquin Park FMP nevertheless adopt Alternative 1, the ABR believes that a restrictive "separation in time" should be applied to Alternative 1. The recommended "separation in time" would prohibit AFA hauling trucks and other heavy equipment from using Alternative 1 between the last Saturday in June and Labour Day (both dates inclusive). This restrictive "separation in time" would not prohibit light vehicles (such as tree-markers' pick-up trucks) from operating between 7:30 am and 6:30 pm daylight saving time (Monday to Friday inclusive, statutory holidays exclusive), in a manner somewhat parallel to the Noise Standards, Section 9.2.3 (page 42) of the Algonquin Provincial Park Management Plan. If in the future, the end of the prime recreational season is officially extended, then this particular "separation in time" would be extended likewise.

## **Billy Lake Road Alternative 2**

Alternative 2 is at a greater acoustical distance from the McCarthy Creek area. However, it has an immediate affect on the Raja/Boot Lake canoe route by overall acoustic impact.

Alternative 2, because of its proximity to Raja, Muskrat, Baily and Boot Lakes, would also affect their recreational use by direct visual impact, as well as by physical and visible dust-cloud impacts.

Alternative 2 would impact on the ecological integrity of the native brook trout population inhabiting Raja, Muskrat, Baily and Boot Lakes. As a result, recreationalists fishing these lakes for the same native brook trout will also be impacted by Alternative 2.

Alternative 2 would be contrary to The Forest Management Access Roads Strategy for the Algonquin Park Forest, which indicates in Section 4.2 Social (page 7) ...

"Road activity in the park needs to be managed to protect scenic quality, solitude and wilderness-like recreational opportunities, all of which are values that park visitors seek to experience. The separation in time and place of forest operations and recreational activity has been used over the past thirty years. However, due to increasing visitation and changing visitor distribution patterns at perimeter/interior access points, noise standards and hauling routes will need further analysis and may require some modifications to manage potential conflicts. ..."

Alternative 2 would also be contrary to The Forest Management Access Roads Strategy for the Algonquin Park Forest, which indicates in Section 7.2 Forest Access Management (FAM) Areas (page 11) ...

"Park values such as waterways, portages, hiking trails, boundaries of other zones (i.e. Wilderness, Nature Reserves) and Park boundary, assist in defining FAM Areas. In effect, each Area is intended to be separate and distinct from other Areas."

The Algonquin Backcountry Recreationalists consider Alternative 2 to be undesirable for the above reasons.

Should the 2010-2020 Algonquin Park FMP nevertheless adopt Alternative 2, the ABR believes that a restrictive "separation in time" should be applied to Alternative 2. The recommended "separation in time" would prohibit AFA hauling trucks and other heavy equipment from using Alternative 2 between the last Saturday in June and Labour Day (both dates inclusive). This restrictive "separation in time" would not prohibit light vehicles (such as tree-markers' pick-up trucks) from operating between 7:30 am and 6:30 pm daylight saving time (Monday to Friday inclusive, statutory holidays exclusive), in a manner somewhat parallel to the Noise Standards, Section 9.2.3 (page 42) of the Algonquin Provincial Park Management Plan. If in the future, the end of the prime recreational season is officially extended, then this particular "separation in time" would be extended likewise.

### **Billy Lake Road Alternative "3"**

Both Alternatives 1 and 2 start their west ends at an existing road east of Vesper Lake. They then proceed southeast on a historical existing roadbed to a point where they diverge together off to the east. It's at this point of divergence, that a historical existing roadbed continues to the west and south. This Alternative "3" eventually proceeds around the east end of Little McCauley Lake, crosses McCauley Creek, turns west along an old rail-bed and eventually exits to Highway 60.

Alternative "3" would comply with The Forest Management Access Roads Strategy for the Algonquin Park Forest, which indicates in Section 4.2 Social (page 7) ...

"Road activity in the park needs to be managed to protect scenic quality, solitude and wilderness-like recreational opportunities, all of which are values that park visitors seek to experience. The separation in time and place of forest operations and recreational activity has been used over the past thirty years. However, due to increasing visitation and changing visitor distribution patterns at perimeter/interior access points, noise standards and hauling routes will need further analysis and may require some modifications to manage potential conflicts. ..."

Alternative "3" would also comply with The Forest Management Access Roads Strategy for the Algonquin Park Forest, which indicates in Section 7.2 Forest Access Management (FAM) Areas (page 11) ...

"Park values such as waterways, portages, hiking trails, boundaries of other zones (i.e. Wilderness, Nature Reserves) and Park boundary, assist in defining FAM Areas. In effect, each Area is intended to be separate and distinct from other Areas."

Alternative "3" obviously involves the re-activation of a configuration which was already abandoned at some point in the past. That abandonment may have been in response to the original construction of the Annie Bay "dam-bridge", the "bridge" component of which is now being eliminated. The opening of such a "new" forest access road on to Highway 60 may be ultimately deemed unviable. If one of the two pre-established alternatives should prevail, the Algonquin Backcountry Recreationalists insists on enforcement of the aforementioned "separation in time" prohibition for haulage trucks and heavy equipment.

## **Manta Lake Road**

### **Manta Lake Road Alternative 1**

Alternative 1 has approximately 3km of new road (to the Narrowbag Road) which is far away from canoe routes. The balance of Alternative 1 involves the upgrading of existing roads. A short section of existing road, that runs close to the northwest bay of Hogan Lake, should be re-aligned to comply with the Ontario Parks Board of Directors recommended setbacks.

Alternative 1 would comply with The Forest Management Access Roads Strategy for the Algonquin Park Forest, which indicates in Section 4.2 Social (page 7) ... "Road activity in the park needs to be managed to protect scenic quality, solitude and wilderness-like recreational opportunities, all of which are values that park visitors seek to experience. The separation in time and place of forest operations and recreational activity has been used over the past thirty years. However, due to increasing visitation and changing visitor distribution patterns at perimeter/interior access points, noise standards and hauling routes will need further analysis and may require some modifications to manage potential conflicts. ..."

Alternative 1 would also comply with The Forest Management Access Roads Strategy for the Algonquin Park Forest, which indicates in Section 7.2 Forest Access Management (FAM) Areas (page 11) ... "Park values such as waterways, portages, hiking trails, boundaries of other zones 6(i.e. Wilderness, Nature Reserves) and Park boundary, assist in defining FAM Areas. In effect, each Area is intended to be separate and distinct from other Areas."

The Algonquin Backcountry Recreationalists supports Alternative 1 for the above reasons.

### **Manta Lake Road Alternative 2**

Alternative 2 would greatly impact the canoe route between Hogan and Philip Lakes (both the Little Madawaska River and the portages that run along it). This impact would involve both a 50' plus bridge span and a high volume of truck traffic coming out of the harvested forest.

Alternative 2 would be contrary to The Forest Management Access Roads Strategy for the Algonquin Park Forest, which indicates in Section 4.2 Social (page 7) ...

"Road activity in the park needs to be managed to protect scenic quality, solitude and wilderness-like recreational opportunities, all of which are values that park visitors seek to experience"

Alternative 2 would be also be contrary to The Forest Management Access Roads Strategy for the Algonquin Park Forest, which indicates in Section 7.2 Forest Access Management (FAM) Areas (page 11) ...

"Park values such as waterways, portages, hiking trails, boundaries of other zones (i.e. Wilderness, Nature Reserves) and Park boundary, assist in defining FAM areas. In effect, each Area is intended to be separate and distinct from other Areas."

The Algonquin Backcountry Recreationalists are highly critical of Alternative 2 for the above reasons.

## **Three Mile Lake Road**

### **Three Mile Lake Road Alternative 1**

Alternative 1 would greatly impact on extensive lengths of the shorelines of Kawa and Upper Kawa Lakes, on the portages between Kawa, Upper Kawa and Three Mile Lakes, on the setbacks from Kawa and Upper Kawa Lakes as recommended by the Ontario Parks Board of Directors, on extensive lengths of the shoreline of Three Mile Lake, on the setbacks from Three Mile Lake as recommended by the Ontario Parks Board of Directors, on the portage between Manitou and Three Mile Lakes and on the setbacks between Manitou and Three Mile Lakes as recommended by the Ontario Parks Board of Directors.

In so doing, Alternative 1 would be contrary to the Forest Management Access Roads Strategy for the Algonquin Park Forest, which indicates in Section 4.2 Social (page 7) ...

"Road activity in the park needs to be managed to protect scenic quality, solitude and wilderness-like recreational opportunities, all of which are values that park visitors seek to experience. The separation in time and place of forest operations and recreational activity has been used over the past thirty years. However, due to increasing visitation and changing visitor distribution patterns at perimeter/interior access points, noise standards and hauling routes will need further analysis and may require some modifications to manage potential conflicts. ..."

The Algonquin Backcountry Recreationalists cannot support Alternative 1 for this reason.

### **Three Mile Lake Road Alternative 2**

Alternative 2 would greatly impact on the portage between Sinclair and Kawa Lakes, on the portage between Manitou and Three Mile Lakes and on the setbacks between Manitou and Three Mile Lakes as recommended by the Ontario Parks Board of Directors.

In so doing, Alternative 2 would be contrary to the Forest Management Access Roads Strategy for the Algonquin Park Forest, which indicates in Section 4.2 Social (page 7) ...

"Road activity in the park needs to be managed to protect scenic quality, solitude and wilderness-like recreational opportunities, all of which are values that park visitors seek to experience. The separation in time and place of forest operations and recreational activity has been used over the past thirty years.



However, due to increasing visitation and changing visitor distribution patterns at perimeter/interior access points, noise standards and hauling routes will need further analysis and may require some modifications to manage potential conflicts. ..."

The Algonquin Backcountry Recreationalists cannot support Alternative 2 for this reason.

### **Three Mile Lake Road Alternative 3**

Alternative 3 would impact on the portage between Upper Kawa and Totem Lakes. Beyond that, its impact on recreational use would for the most part be only of an acoustic nature.

The Algonquin Backcountry Recreationalists support Alternative 3 for this reason.

### **Three Mile Lake Road Additional Condition**

The Forest Management Access Roads Strategy for the Algonquin Park Forest indicates in Section 7.2 Forest Access Management (FAM) Areas (page 11) that

...

"Park values such as waterways, portages, hiking trails, boundaries of other zones (i.e. Wilderness, Nature Reserves) and Park boundary, assist in defining FAM Areas. In effect, each Area is intended to be separate and distinct from other Areas."

In keeping with the principals embodied in this section, the Algonquin Backcountry Recreationalists request that any secondary road "loops", that join-up the Three Mile Lake (primary) Road (including the Totem Lake Road) and the Maple Lake (primary) Road, be permanently "broken" at those locations where they cross canoe route waterways and/or portages. No matter which alternative prevails, this applies to any crossing of Maple Creek. Should Alternative 3 prevail, this would also apply to both Maple Creek and to the portage between Manitou and Three Mile Lakes, and to the setbacks between Manitou and Three Mile Lakes as recommended by the Ontario Parks Board of Directors.

## **Thompson Lake Road**

### **Thompson Lake Road Alternative 1**

Alternative 1 would necessitate a substantial bridge (approx. 40') to be built between Thompson and Little Thompson Lakes. While there is not yet a recreational use in this immediate area, Alternative 1 would produce a negative impact on the area's natural watercourse environment.

In addition, Alternative 1 would produce a new "park-boundary" access road which would join up with a complex of forestry roads immediately north of the park, at a point that couldn't be easily monitored and/or restricted. This would be contrary to the Forest Management Access Roads Strategy for the Algonquin Park Forest, which indicates in Section 4.1 Environmental (page 6) ...  
".. Increased human activity around the perimeter of the Park, notably off-road vehicle (ORV) travel, such as ATVs, 4x4 pickup trucks and snowmobiles, and the potential for corresponding increase in unauthorized access to the park interior, pose a threat to Park values. .."

The Algonquin Backcountry Recreationalists cannot support Alternative 1 for this reason.

### **Thompson Lake Road Alternative 2**

Alternative 2 would involve no major permanent bridges between Thompson and Little Thompson Lakes. While there is not yet a recreational use in this immediate area, Alternative 2 would produce no impact on that area's natural watercourse environment.

While Alternative 2 would produce a new "park-boundary" access road, it would join-up with Daventry Road in a direct configuration, which could be much more easily monitored and/or restricted. This would be conducive with the Forest Management Access Roads Strategy for the Algonquin Park Forest, which indicates in Section 4.1 Environmental (page 6) ...  
".. Increased human activity around the perimeter of the Park, notably off-road vehicle (ORV) travel, such as ATVs, 4x4 pickup trucks and snowmobiles, and the potential for corresponding increase in unauthorized access to the park interior, pose a threat to Park values. .."

Alternative 2 would bring forestry traffic to Daventry Road at a point from which it would travel north, well away from the Brain Lake area, thereby saving that area from a large amount of additional visual, acoustic and dust impact.

As a result, Alternative 2 would also comply with The Forest Management Access Roads Strategy for the Algonquin Park Forest, which indicates in Section 4.2 Social (page 7) ...

"Road activity in the park needs to be managed to protect scenic quality, solitude and wilderness-like recreational opportunities, all of which are values that park visitors seek to experience. The separation in time and place of forest operations and recreational activity has been used over the past thirty years. However, due to increasing visitation and changing visitor distribution patterns at perimeter/interior access points, noise standards and hauling routes will need further analysis and may require some modifications to manage potential conflicts. ..."

The Algonquin Backcountry Recreationalists supports Alternative 2 for these reasons.

### **Thompson Lake Road Alternative 3**

Alternative 3 would add even more visual, acoustic and dust impact to Daventry Road along a section where that road already impacts upon Brain Lake, its backcountry campsites, associated canoe route, and its west shore's proposed setbacks (as recommended by the Ontario Parks Board of Directors).

Alternative 3 would therefore be contrary to The Forest Management Access Roads Strategy for the Algonquin Park Forest, which indicates in Section 4.2 Social (page 7) ...

"Road activity in the park needs to be managed to protect scenic quality, solitude and wilderness-like recreational opportunities, all of which are values that park visitors seek to experience. The separation in time and place of forest operations and recreational activity has been used over the past thirty years. However, due to increasing visitation and changing visitor distribution patterns at perimeter/interior access points, noise standards and hauling routes will need further analysis and may require some modifications to manage potential conflicts. ..."

The Algonquin Backcountry Recreationalists cannot support Alternative 3 for this reason.