



Algonquin Backcountry
Recreationalists

Comments Regarding the Algonquin Park 2010-2020 Forest Management Plan

Roads of Concern

One of the key issues to recreationalists in the context of the 2010-2020 Algonquin Park Forest Management Plan (FMP) is the placement of roads in relation to recreationalist facilities, namely canoe routes and backpacking trails. As the Algonquin Park Management Plan recognizes, roads can be extremely disruptive to recreationalist activities. In fact, it goes as far as to note that “No new crossings of portages or canoe routes will be allowed unless no other options are available” as well as providing a minimum setback of 120m for all other interactions with canoe routes and other recreationalist facilities.

Although all new road crossings of recreational trails are of serious concern, the sheer number proposed has forced us to focus on a select few. This in no way indicates our support for other crossings, but is just a reality given the resources at our disposal. Looking at the map of proposed branch roads the members of the ABR were particularly concerned about the eight interactions described in the following pages.

All of these have one thing in common; while the Area of Concerns (AoCs) which define setbacks to minimize negative impacts on the recreationalists' experience are properly labeled on the proposed 1:15 840 scale operations maps provided to the public by the Algonquin Forestry Authority (AFA), the reason why these roads are provided exceptions to the prescribed setbacks is not. All of the following eight examples have the AoC violations characterized as “AoC Crossing Locations” on the aforementioned operations maps, but this is not how they are designed (As indicated by the proposed paths for these roads on those same AFA operations maps). Instead, these AoC violations are in locations where the proposed roads parallel recreationalist routes. This is exactly what these AoCs are designed to prevent and as such we feel that these crossings are highly inappropriate and that the terminology used to justify these incursions is misleading and inappropriately labeled.

The redefinition of what an AoC Crossing Location is threatens the fundamental balance between the interests of recreationalists and the needs of the local forest industry because it disregards the reason such crossings are permitted in the first place, locations at which no other options are available; “[Crossings] are limited to those essential for timber harvesting activities” according to the Algonquin Park Management Plan.

Fundamentally, if the hard fought protections provided by the Algonquin Park Management Plan are not recognized and implemented in practice, they are meaningless. This is in ignorance to the ‘mixed use’ philosophy of the Park’s Recreation/Utilization zone and the management policy of trying to reduce interactions between conflicting uses to a minimum.

Clara Lake Road

Canoe Route Setback, Campsite Setback, Backpacking Trail Setback

Clara Lake Road is proposed to be constructed within 120m of a canoe route (The minimum setback required by the Algonquin Park Management Plan for roads not crossing canoe routes, waterbodies, or other recreationalist trails) for the last 1.6km of it's length. At it's closest point it appears to be within approximately 20m of the shore of Clara Lake.

Additionally, it appears that Clara Lake Road is proposed to travel through the Western Uplands Backpacking trail or parallel it by approximately 10m. In the process it appears to pass through or within 10m of the two backpacking campsites on the lake (Indicated as black dots on the map below.)



Clara Lake, McCraney Township

Varley Lake Road

Canoe Route Setback, Campsite Setback

Varley Lake Road is proposed to be constructed within 120m of a canoe route for 700m near the end of it's length. At it's closest point it appears to be within approximately 55m of the shore of Bug Lake.

Additionally, it appears that Varley Lake Road is proposed to travel within 30m of the two canoe campsites on the lake (Indicated as hollow black triangles on the map below.)



Bug Lake, Boyd Township

Rowan Lake Road

Canoe Route Setback

Rowan Lake Road is proposed to be constructed within 120m of a canoe route for a total of approximately 220m near the end of its length. At its closest point it appears to be within approximately 105m of the shore of Rowan Lake.



Rowan Lake, Barron & Stratton Townships

Totem Road

Portage Setback

Totem Road is proposed to be constructed through the portage between Upper Kawa Lake and Totem Lake for a total of approximately 220m. Rather than simply crossing the portage, this proposed road replaces the portage for one quarter of its length.

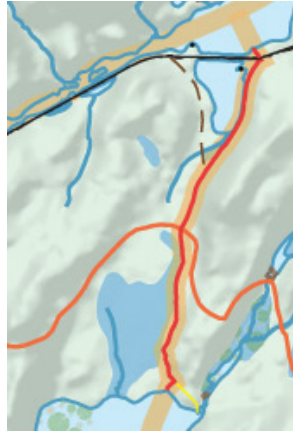


Totem Lake, Wilkes Township

Little McCraney Lake Road

Portage Setback

Little McCraney Lake Road is proposed to be constructed paralleling the portage between Upper Kawa Lake and Totem Lake for a total of approximately 500m at a distance of 50m. As defined by the Algonquin Park Management plan, roads within 120m of portages are crossings yet this represents just under one third of the length of the portage.

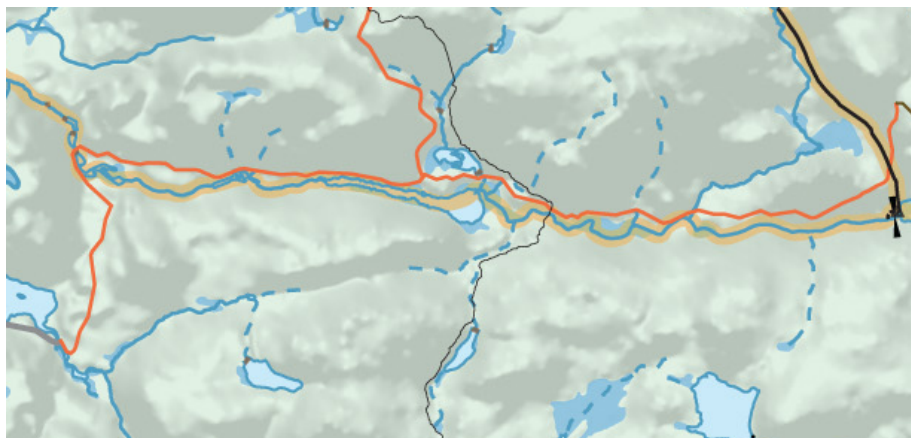


Little McCraney & Rain Lake, McCraney Township

West Harry Lake Road

Canoe Route Setback

West Harry Lake Road is proposed to be constructed intermittently within 30m of a canoe route not currently maintained by the Ministry of Natural Resources for approximately 4.3km. At its closest point it appears to follow the bank of the river. Despite the fact that it is disappointing that the Ministry of Natural Resources does not prescribe canoe route AoCs for canoe routes it does not currently maintain, it is of concern to us because it is still regularly used as a canoe route and has the potential for development as part of Algonquin Park's official canoe route network (As previous Algonquin Park Management Plans have recognized). The ABR is not requesting setbacks in excess of the currently prescribed AoCs for waterbodies, but are concerned about the enforcement of those existing protections.



Big East River, Finlayson Township

Winifred Lake Road

Canoe Route Setback

Winifred Lake Road is proposed to be constructed within 30m of a canoe route not currently maintained by the Ministry of Natural Resources for approximately 290m. At its closest point it appears to be within 10m of Winifred Lake. This road is of particular concern because Winifred Lake was only recently removed from the network of portages maintained by the Ministry of Natural Resources. The ABR is not requesting setbacks in excess of the currently prescribed AoCs for waterbodies, but are concerned about the enforcement of those existing protections and would like the Ministry of Natural Resources to re-evaluate the current policy of removing areas of concern whenever funding requires cutbacks in the number of maintained canoe routes. This road has the potential to make the future reestablishment of this removed canoe route impossible despite future pressures on the currently maintained canoe route network.



Winifred Lake, Paxton Township

The Planning Process

As this is the final stage of the process in which public participation is sought, the ABR would like to take the opportunity to address specific concerns about the FMP process to date, both in terms of the methodology used to select and justify the above road alignments and in terms of the manner in which public consultation has been integrated into the FMP planning process.

Public Consultation on Primary Road Alignments

During the third stage of the FMP planning process, the public was offered the opportunity to comment on and help select the alignments for the four new proposed primary roads. In each case, two or three potential alignments were shown and the public was asked to choose which alignment was most favourable to them.

Presumably this process was designed with equally viable alignments chosen for public review, at which point external social concerns could be addressed. Thompson Lake Road provides a particularly good example of that not happening. The ABR recognizes that competing interests between members of the public means that the alignments that were preferable to us may or may not have been chosen in each case. The specific choices that ended up being selected are not at issue, but rather the fact that despite the actuality that one of the three proposed routes was documented to be unopposed, it was dismissed as not being technically compliant with the AFA's needs. Essentially, only knowledge that preexisted the public consultation process was used. It is inappropriate to present technically unfeasible options to the public for review as it deprives the public the opportunity to contribute to the forest management plan (The point of the public consultation process).

Park Border Crossings

Park border crossings are of concern to us because of the potential for increased access to the interior of the park and the resulting detrimental effects that this has on recreationalist users. The Algonquin Forestry Authority and the Ministry of Natural Resources cited this reasoning when rejecting our suggestion for an alternative alignment for the primary road accessing Forest Access Management (FAM) Zone 25. The ABR respects this reasoning as we recognize the potential negative impacts of park border crossings as noted above. Our concern is in regards to the proposed violations of this policy. The draft FMP recommends the construction of five new crossings at the intersections of the following roads with the Algonquin Park border: Trout Creek Road, Thompson Lake Bypass, Harvey Lake Road, Bronson Road and Bonnechere Road. We recognize that some or all of these roads may have existed in the past, but the Algonquin Park Management Plan specifically forbids this; "Existing road crossings of the Park Boundary, other than public access roads, may be phased out and no new road crossings will be permitted". Importantly, the word 'existing' is defined two lines above to mean "Can be travelled by a conventional half-ton truck". As Jeremy Inglis indicated to one of our Executive Committee members "These roads are being planned as 'new roads' because they are currently un-driveable." Since the Algonquin Park Management Plan defines 'existing roads' to be drivable, the aforementioned roads should be considered new (As Jeremy confirms) and as such those crossings should be prohibited by the Management Plan.

“Lightening the Footprint” Management Plan Amendment

The now accepted recommendations of the joint Ontario Parks Board (OPB) and AFA committee to increase setbacks along selected canoe routes are in minor conflict with a few of the AFA's proposed road alignments (Behan Lake Road, Whisper Lake Road, Varley Lake Road, and Clara Lake Road); all of these locations are not crossings but rather locations where the proposed road alignment runs parallel to recreation routes with now-expanded setbacks. Although the proposed Algonquin Park Management Plan amendment allows existing roads to violate the accepted plan, as it was noted above these roads are considered 'new' for the purposes of planning and their alignments should be amended to follow the new setbacks.

Upgrading of Roads with No Public Consultation

Past practice has seen all new roads, as well as road upgrades (ie Operational to Branch and Branch to Primary) presented to the public for consultation (ie Vireo Lake Road in the 2005 FMP). However, this was not the case during the planning period for this FMP. This is especially significant because of the extent of the reclassification; Of the approximately 1125km of drivable primary and branch road that currently exists, the ABR has been lead to understand that approximately 280km of operational roads will be reclassified as branch roads and another 204km of branch roads will be reclassified as primary roads. This is quite significant as it represents 43% of the currently drivable branch and primary roads. To put that in perspective, only 23km or 2.1% of the currently drivable branch and primary roads were upgraded during the 2005 FMP.

While we recognize the fact that some of these 'upgrades' will not currently result in any changes to the size and use of the existing roadbed at this time and are spurred by the redefining of road classifications, we are concerned since future upgrades to bring the affected roads in line with others that fall into that classification would not require any public consultation. Additionally, in the case of operational roads that are being reclassified as secondary roads the public was never given an initial opportunity to submit their opinions on the road alignments in question or voice their opinions on the suitability of specific alignments and as such we feel the reclassification of them as secondary roads should make them new roads for planning purposes. Of even greater concern is the fact that the Ministry of Natural Resources allowed some of these changes that it recognized were part of the 2010-2020 FMP to be approved through amendments to the 2005 FMP (This is documented on the Ontario Forest Plans website.) We believe that all major changes to road classifications should be presented to the public for consultation and that no changes for the 2010-2020 FMP should be approved through amendments to the 2005 FMP.

The Redevelopment of Abandoned Roads

In regards to road alignments that violate AoCs, part of the justification provided to one of our Executive Committee members by Jeremy Inglis was that many of these newly proposed roads are to follow the alignments of previously abandoned logging roads. While the ABR understands that the MNR and AFA may see benefits in reusing old road beds, we cannot accept this as justification.

This raises an issue regarding the implications of the resulting lack of public input that is involved with this methodology. It is unacceptable to present potential road alignments to the public as 'unchangeable' during the public consultation process. If the alignments have already been set, then there is effectively no real public consultation process. The public must be allowed to make meaningful input into the FMP process. Just as the FMP has implications for the forestry industry, there are implications for other competing interests and the public consultation process should represent an understanding of that reality. It's not good enough to ignore current policy in regards to AoCs and other variables affecting road alignment because of past practices, regardless of their place in the park as it is currently managed.

Strangely, this was recognized in the alignment options presented to the public for Three Mile Lake Road but was not recognized anywhere else.

Road Alignments During Construction

Mr. Inglis also made note of the fact that during construction, a leeway of up to 500m in either direction is given in determining the actual road alignment, compared to the plan produced in advanced and shared with the public. In some situations this would imply that proposed roads could be built on the opposite side of small lakes they follow, as compared to what was presented to the public. This has the potential to have an even greater impact on the meaningfulness of AoCs and the entire public consultation process, than some of the aforementioned issues.

As an inspection of the proposed 2010-2020 operational maps show, it is quite frequent that this buffer falls within 500m of a lake. The idea that this policy would technically allow a road that is proposed as being set back 500m from a lake to border it and still be within the allowable confines of the approved road alignment is extremely unsettling. The ABR is vigorously opposed to such an indecisive planning system. We recognize that minor modifications may be needed to be made to road alignments based on the conditions experienced when the road is being constructed. However, we firmly believe that this buffer should be drastically reduced in all areas with special consideration in areas where proposed roads are quite close to AoCs. The idea that the roads violating AoCs as documented above may be realigned from the proposed alignment during construction is not good enough. As we have already expressed, we believe that the public consultation process is crucial to the FMP planning process and in order to be effective the decisions made during that process must be respected when the plan is implemented.

Requests for Information

Our final concern stems from the actual process of gathering the data needed to critically analyze, understand and critique the FMP as it is being created. While the ABR recognizes that the plan evolves over time during the planning term and that any information provided is subject to potential revision, it was quite difficult to obtain this sort of crucial information necessary for making informed recommendations. For instance, when asked to recommend alignments for the proposed new primary roads, no information was shared with the public on the resulting new branch roads that would be proposed because of the specific alignment chosen. Since our concern is around the impact of roads on recreationalist trails, we may have recommended a specific road alignment because it appeared to reduce the total number of crossings of recreationalist trails, however because the specific primary road alignments dictated the branch road alignments that resulted, our recommended alignment could very well have resulted in more crossings. Unfortunately this information was only presented for public comment once the primary road alignments were determined.

In light of the disappointing way in which that stage of the planning process was handled, a few members of our Executive Committee later made requests for information relating to FAM zones, the actual road alignments, and high quality versions of the proposed road alignments for the purpose of analysis and criticism. Initially one of the members of our Executive Committee was told that an FAM map would only be available with the draft plan, not when comments were being requested on the alignment of branch roads; Being told that Billy Lake Road was necessary to provide access to FAM Zone 25 yet the boundaries of FAM Zones were unavailable is a particularly striking example. That was later rectified, but despite the fact that we later learned that many of the new roads follow old alignments as well as the fact that GIS files of the proposed road alignments must have existed in order to create the buffers shown on the map that showed the proposed new branch roads, we were told that this data was unavailable. This explains why we were unable to properly analyze and comment the proposed branch road alignments until this stage where the draft FMP has been released and the proposed road alignments have been documented on the proposed 2010-2020 operational road maps. Even still, the request for higher quality road data was not fulfilled resulting in a large amount of required labour to

georectify all of the provided operational maps and then trace the alignments as shown. All of the conclusions we reached were because of this ability to overlap and compare various data sets yet the data itself was incredibly hard to obtain.

The lack of access to relevant data is the main obstacle to providing informed and accurate feedback to the MNR and AFA. Since we feel that the ability to make well researched and thought out analysis is crucial to the FMP process, we urge the Ministry to recognize that the data required to preform independent analysis must be made freely available at the point in time at which comments are being sought.