

Ministry of Natural Resources and  
Forestry

Ministère des Richesses naturelles et des  
Forêts

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Dear Catchacoma Forest Stewardship Committee,

Thank you for your letter on February 1<sup>st</sup>, 2021 providing input to the 2021-31 Forest Management Plan for the Bancroft-Minden Forest. Your comments and questions have been reviewed by the Planning Team and we offer the following feedback. Below you will see that we have provided a response to each of your issues and recommendations.

Summary of specific recommendations for the 2021-2031 proposed operations:

**1. *The MNRF undertake field studies to assess the presence of early onset old and old-growth hemlock forest based on indicators identified in the Old Growth Policy for Ontario's Crown Forests. Until these are completed, apply the precautionary principle and remove the Catchacoma Forest from proposed operations.***

We would like to begin by reiterating that the emulation of natural forest disturbances (i.e. forest fires, tree defoliating insect outbreaks) is one of the key concepts of sustainable forest management. Forest fire suppression occurs for many reasons and natural levels of insect defoliation have been altered by human activity. In the absence of these disturbances, sustainable forest management is used to promote a natural range of forest compositions, age class structures and landscape patterns.

We recognise the importance of the presence of older forests. We agree and actually see this as a testament to the success of sustainable forestry in the Catchacoma Forest where it has occurred for generations. However, note that while many stands have older trees, they are not necessarily old growth forests based on the Forest Resources Inventory (FRI) age of the stand if they don't meet the criteria of Old Growth in the Forest Management Guide for Great Lakes-St. Lawrence Landscape. Uneven aged or all aged forests are particularly challenging to quantify as 'old growth'. These stands contain trees of all ages, however sustainable forestry can and does provide the opportunity to retain old growth characteristics.

Also, many un-even aged forest stands have numerous old trees and old growth characteristics along with trees of all ages. Harvest prescriptions prepared by registered professional foresters and implemented by trained tree markers can and do retain old trees and old growth characteristics. This must be balanced with the need for natural levels of young forest and early successional wildlife habitat. The upcoming Draft FMP will outline the specific techniques for maintaining old growth conditions in uneven-aged managed stands that have old growth characteristics. This includes longer rotations and higher residual basal areas. Similar prescriptions are available in the current FMP as well if you want to review them now. Please see Ontario's Tree Marking Guide for more information on prescriptions to retain old growth characteristics.

In terms of your recommendations, all harvest areas, including the areas identified by AFER, and other stands with older trees, will be carefully assessed by registered professional foresters and these areas will be marked by certified tree markers to retain old growth characteristics where appropriate. Since the Proposed Operations review Stage, BMFC has decided to remove block 1711 from the bridging harvest allocations, so it will not be showing as allocated in the Draft Plan maps. The Contingency block 3710 is not available for operations upon approval of this FMP. It would need to be brought into regular harvest through an amendment, which may be subject to public consultation. Forest Management Plan Amendment descriptions and processes are found beginning on page C-5 of the FMPM (2020), Part C, Section 2.0. Block 2749 and 3710 will not be removed from regular harvest for Draft Plan submission but will continue to be carefully managed.

Requirements are already in place through the Conditions on Regular Operations (CROs), such as wildlife retention trees and downed woody debris, to preserve important features for wildlife, Old Growth features and waterways, etc. For the areas of operations for the 10-year period, including contingency areas, prescriptions and conditions on regular operations will be developed. Operational prescriptions for areas of concern will be developed for all harvest, renewal and tending, and protection areas. Areas of concern conditions will be developed for all roads, landings, and forestry aggregate pits for the 10- year period. FMPM Part A, Section 1.3.5.2 provides direction for silvicultural ground rules and conditions on regular operations for harvest, renewal and tending operations.

The Planning Team and the MNRF continue to consider the interests and data you have submitted regarding the protection of old hemlock trees near Catchacoma Lake, including your recent assertion that the precautionary principle should be applied. MNRF will commit to further investigation and analysis of this site to determine if additional provisions such as harvesting to retain some of the key habitat and aesthetic features of old growth forest, as identified in the Ontario Tree Marking Guide, are needed to protect and /or enhance old growth features as part of the new 2021-31 FMP. We would like to reiterate again that while choosing proposed allocations for Stage 3 – Proposed Operations and Stage 4 – Draft Plan, the Planning Team considered your concerns with the Old-Growth Hemlock seriously and did their best to avoid allocation of Old-Growth Hemlock across the landscape. As mentioned previously, Block 3710 was changed from preferred allocation at LTMD to Contingency Harvest, which means that it can only be harvested if it is brought into Regular Harvest through an FMP Amendment, which may include public consultation. Additionally, Block 1711, which was shown as Regular Harvest in Proposed Operations, has been removed from allocations for Draft Plan, which will be available for review on the NRIP website from March-May 2021. Additionally, a comparison of proposed operations to the long-term management direction will be available for review at Draft Plan.

In terms of your request for MNRF to undertake field studies to assess the presence of early onset old and old-growth hemlock forest based on indicators identified in the Old Growth Policy for Ontario's Crown Forests, we would like to identify that the approved Forest Management Guide for Great Lakes-St. Lawrence (GLSL) landscapes apply a coarse and fine filter approach to conserving biodiversity across landscapes and align with the CFSA objective categories in the FMPM (2020).

Landscape Guide indicators address old growth through indicators related to the structure, composition and pattern of the forest within the management unit.

The legislation in these manuals meets the requirements of the Old Growth Policy. Regarding removing the rest of the blocks from harvest, the Public Lands Act (PLA) provides the Minister of Natural Resources and Forestry with the legislative authority to manage Ontario's Crown land. Section 12 of the PLA provides MNRF the basis to carry out land use planning on Crown land south of the Far North boundary. Land use planning is a process by which Crown land and waters are assigned to specific "land use designations" (e.g., general use area, enhanced management area) with associated policies for the types of uses that may or may not occur on those areas. Crown land use planning strives to consider a broad range of interests including those of the public, stakeholder groups and indigenous communities. Planning can result in the establishment of a new designated land use area, changes to existing land use area boundaries, and/or changes to the policies that are associated with a specific area.

Crown land use policy:

1. can apply to Crown land across the province or to a site-specific area
2. outlines where and under what conditions activities can occur on Crown lands and waters in Ontario (i.e., how Crown land can be used)
3. enables MNRF to make subsequent, site-specific decisions about the use and management of Crown land and resources
4. provides context for more detailed resource management planning and the implementation of programs, projects and activities in an integrated, efficient way.

Area-specific Crown land use policy information can be found in the Crown Land Use Policy Atlas (CLUPA), an interactive database and mapping tool available to the public.

An amendment to Crown land use policy (a CLUPA amendment) is required to change area-specific Crown land use designations, the uses that may or may not occur, or a land use area boundary. The Guide for Crown Land use Planning (The Guide) provides policy guidance to MNRF staff and others involved in land use planning and for amendments to Crown land use policies for Crown lands under the authority of the PLA, south of the Far North planning area. Information related to Crown land use planning and CLUPA amendments can be found at <https://www.ontario.ca/page/crown-land-planning>. Please note that The Guide will be updated later this winter to reflect the transition of the Provincial Parks and Conservation Reserves Act to The Ministry of the Environment, Conservation and Parks.

Requests for amendments from external parties are subject to the amendment submission requirements and screening process currently outlined in Section 5.2 of the Guide. Individuals or organizations, including Indigenous communities, members of the public or stakeholders can request an amendment to change Crown land use policies. Requests for land use amendments must be submitted in writing to the appropriate MNRF office and include:

1. a description of the proposed change, including location information and a map
2. any partners in the amendment proposal and
3. rationale for the amendment and a discussion of its significance and implications.

MNRF will review the information and considers several factors (also outlined in section 5.2) in making a decision on whether to proceed. MNRF will provide a written response to the requestor identifying one of three possible outcomes:

1. proceed with planning
2. deny the request, or
3. request further information.

As land use planning is a public process, the outcomes of planning are not guaranteed. It is important to note that area-specific land use policies for the Catchacoma Forest area were developed through comprehensive and public Crown land use planning processes and acknowledge the value and importance of the forest resources in the area both recreationally and commercially.

MNRF does not have a role in regulating or managing protected areas under the PPCRA (i.e., conservation reserves, provincial parks). The Ministry of the Environment, Conservation and Parks (MECP) is responsible for the regulation and management of protected areas (Provincial Parks and Conservation Reserves) under the Provincial Parks and Conservation Reserves Act (PPCRA).

MNRF's role, under the PLA, would be to undertake or facilitate the public land use planning process to assign Crown land to a land use designation that enables the subsequent establishment of Provincial Park or Conservation Reserve through regulation under the PPCRA (e.g., Recommended Provincial Park or Recommended Conservation Reserve). As above, all amendment requests need to be screened according to a number of criteria outlined in the Guide for Crown Land Use Planning, to determine whether or not the request should proceed.

MNRF will only consider requests for land use policy amendments, whose objectives involve the creation of new PPCRA protected areas, where the MECP is supportive of or leading the request. We appreciate your request for the MNRF to use the precautionary principle and can offer this assurance that we do. The MNRF uses an adaptive management framework to address uncertainty in forest management on Crown forests. Adaptive Management is applied as a strategy to exercise precaution and special concern in the face of uncertainty in the development of the policies being implemented through Forest Management Plans. The iterative cycle of continual improvement, where policy, developed based on the best available information, is treated as hypotheses, and monitoring of the policy as it is implemented forms part of the evaluation of the hypotheses. The policy is then revised based on the new knowledge and lessons learned from implementation and evaluation, or from new science and technology. Forest Management Planning is also conducted in an Adaptive Management cycle.

A Forest Management Plan is prepared by a plan author who is a Registered Professional Forester, who certifies that the FMP provides for the sustainability of the Crown forest. The FMP is implemented as scheduled in the annual work schedule and as reported in the annual report. Following year five, the implementation of the FMP to date is assessed and a determination is made as to whether the implementation of the FMP has provided for the sustainability of the Crown forest and recommendations for future planning are provided. The next FMP is prepared in consideration of recommendations from the year five annual report; changes to the forest condition; updates to science and policy; and specific efforts to confirm, update, or revise management objectives and practices.

In terms of your assertion of discrepancies between the FRI data and your claim that the new FRI has not been delivered to you yet, we would like to refer you to the letter sent by Suzy Shalla on January 11<sup>th</sup>, 2021, where we described how the FMP mapping products are generated from FRI data which is updated prior to the start of a new FMP planning cycle. The FRI inventory used in the current 2011-2021 FMP is different from the updated planning inventory being used for the new 2021-2031 FMP. This may account for the differences which you have noted. We described to you that the new FRI inventory data can be accessed from the GeoHub warehouse at <https://geohub.lio.gov.on.ca/>.

The MNRF consistently conducts compliance surveys on harvest blocks to ensure consistency with the FMP. On Feb 2, 2021 the MNRF Senior Compliance Technician and the Management Forester did a joint inspection of Block 1711 with two representatives from the Bancroft Minden Forest Company. A number of plots were put into the area harvested to gain an understanding of the residual stocking and stand structure. It was found that the stocking was above the target basal area (stocking) prescribed for the stand and the stand structure represented an un-even aged Hemlock stand. The tree marking audit done previously showed the removal of trees to be approximately 1/3 of the stand which coincides with the survey done by the MNRF. The Forester also took a walk through an area that was still to be cut and found the tree marking followed the prescription well and did not see any issues regarding over-cutting. Stand damage was found to be minimal and, with winter operations, damage to the site and forest floor was minimal due to the frozen condition. It was found that some marked trees were left uncut in the smaller size classes and that more effort could have been put into removing them. The operator was asked to return to remove these remaining marked trees. The importance of removing the smaller trees is to give the better hemlock trees more “release”, to increase the size of the crown of the residual tree. These efforts are a way to mitigate the effects of future attacks from the invasive Hemlock Woolly Adelgid.

***2. The MNRF undertake field surveys to identify wildlife values within the Catchacoma Forest, prioritizing potential SARs with associated Areas of Concern prescriptions, such as Blanding’s turtle and Cerulean warbler. Proposed operations should be suspended until such surveys are completed.***

MNRF undertakes field surveys on an annual basis to identify wildlife values. Surveys are conducted throughout the year at the time of year that is biologically appropriate for detecting species presence. Survey areas are prioritized based on the likelihood of species occurrence, potential risk to the species from forestry operations, and planned harvest schedule.

Prioritization is guided by the MNRF Southern Region Annual Values Collection Strategy. Work planning for the 2021-2022 field season is underway, but not complete. Priority will be given to harvest areas identified by the SFL as likely to be harvested in the first several years of plan implementation. Efforts are made to survey all areas with high potential for high priority species (i.e. species that may experience relatively large negative impacts from forestry operations if AOCs are not applied) prior to harvest operations commencing.

**3. Proposed operations around the central-west wetland in the Catchacoma Forest be suspended until a full wetland evaluation is completed.**

The Ontario Wetland Evaluation System (OWES) was created to provide a standardized approach to map wetlands, assess their functions and determine their level of significance for purposes of municipal land use planning. In the forest management context, wetlands identified as provincially significant based on OWES are addressed through the application of an AOC prescription. Wetlands not identified as provincially significant are sometimes addressed through the application of AOCs for associated open water features such as lakes, ponds, rivers, and streams. When not included in other water AOCs, permanent non-forested wetlands are addressed through the application of Conditions on Regular Operations (CROs). AOC and CRO direction for all wetlands focuses on minimizing the risk of sedimentation or disrupting hydrological functions. Additional direction within the AOC for provincially significant wetlands seeks to maintain the natural features and ecological functions that make a wetland provincially significant. The direction in forest management guides is designed to protect the integrity of all aquatic habitats, including permanent and seasonal wetlands.

Wetlands provide important habitats for a variety of wildlife. In addition to AOCs and CROs for wetland features, the 2021-2031 Bancroft Minden FMP contains AOC prescriptions for values that frequently occur in wetlands, including great blue heron colonies, Blanding's turtle habitat, and species at risk birds such as black terns, least bitterns, and yellow rails. A wetland evaluation can be completed by a qualified professional trained in the utilization of OWES. MNRF's role in wetland evaluations is to review and confirm that wetland evaluations are completed in accordance with the provincial framework (OWES), and to update information in the provincial database known as Land Information Ontario (LIO). Completed wetland evaluations can be submitted to the MNRF for confirmation at any time. The CFSA and forest management guides do not require wetland evaluations prior to forest operations occurring.

**4. The MNR and BMFC engage with the CFSC and other stakeholders to identify and map the hiking trails within the Catchacoma Forest prior to any future operations.**

Please refer to previous messaging from the Bancroft District staff regarding how to submit values into LIO. Once a trail is included in LIO, it will be added to the Values Maps. As identified in your letter, the Trail CRO 4.2.2.15 regarding recreational trails was in the Review of Proposed Operations for the 2021-2031 FMP. Please note that it will again be available for review online on NRIP during Draft Plan review from March 19-May 17, 2021. We advise you to reach out to the Bancroft Minden Forest Company in order to make sure they are aware of the trail networks so they can discuss the timing and extent of operations with you.

We hope that this letter adequately addresses your concerns and the Planning Team and encourage you to keep the line of communication open with BMFC and thanks you for your input to the Bancroft-Minden 2021-2031 FMP.

Yours truly,

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