

Ministry of Natural Resources and
Forestry

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November 4, 2020

Catchacoma Forest Stewardship Committee
c/o Katie Krelove - katie@wildernesscommittee.org

RE: Response to Submission to Review the Proposed LTMD for the Bancroft-Minden Forest Management Unit (sent October 14, 2020 via email)

Thank you for participating in the public consultation period of the Long Term Management Direction (LTMD) for the Bancroft Minden Forest Management Unit. We appreciate your contribution of the AFER studies, and the amount of hard work that must have gone into developing them by all involved. The planning team has reviewed your input and done our best to respond to your concerns which are addressed individually below.

First, we would like to address the CFSC suggestion that the Catchacoma Forest is the largest known hemlock stand of its type. According to the 2010 Landscape Guide for Great Lakes St. Lawrence Landscapes (referred to as the Landscape Guide) - which is a major part of the policy framework for forest management planning in Ontario - in order to qualify as a Hemlock forest unit (Landscape Guide forest unit HE1), the species composition must have a hemlock component greater than or equal to 40%; the accepted threshold for a leading or dominant species in a forested stand. In the Bancroft Minden Forest 2021 LTMD, the plan forest unit identifier for hemlock dominant stands is "HESH" (the equivalent of the HE1 landscape guide forest unit).

In the Crown land area being referred to as the Catchacoma Forest, Hemlock stands represent 299 hectares of a total geographic area of 568 hectares (53%). Additionally, for the hemlock forest unit to be considered old growth, it must reach an age of 155 years (see table 3 of the Landscape Guide on page 24). In the Catchacoma forest, 19 hectares meet the Landscape Guide definition of old growth, representing 6% of the total hemlock within the Catchacoma or 2.5% of all the hemlock old growth in unprotected Crown land within the entirety of the management unit. See the attached map which depicts the Forest Resource Inventory information for the Catchacoma Forest.

Nearly half (47%) of hemlock stands in the Catchacoma forest have experienced recent harvest activity. The most recent harvest is currently partially complete and ongoing in the 2011 FMP as harvest block 1711 at the center of the Catchacoma forest (see the area outlined in black on the attached map), which overlaps part of the area harvested in 1988 through a partial harvest.

Old Growth Hemlock can be found throughout the Management Unit on Crown land mostly concentrated on the Western (Minden) side of the unit. In Hindon township alone there are 215 hectares of hemlock old growth in several clusters. Old growth hemlock is also represented in parks and protected areas e.g.) there is 182 hectares of Old Growth Hemlock in Kawartha Provincial Park alone.

For the reasons outlined above, we do not consider the Catchacoma forest to be the largest known stand of this type.

Requests for changes to specific Crown land use policy is beyond the scope of this planning process. Crown land north of Catchacoma Lake is part of the Forest Management Plan for the Bancroft Minden Forest Management Unit and current Crown land use planning direction stipulates that forest management will occur in the area. Any long-term protection efforts targeted at changing current land use designations and activities should be redirected to land use planning mechanisms which are out of scope of the FMP process.

1. Consideration of studies and reports submitted by AFER:

- a. As discussed at our meeting with representatives of the CFSC on October 13, 2020 we would like to re-iterate that the meeting held on February 13, 2020 between members of BMFC, MNRF, yourselves and a representative from Curve Lake First Nation, was specifically meant to address concerns surrounding an active harvest operation (block 1711) which is approved in the 2011 FMP. This meeting was set up after members of your group sent a letter to the Indigenous community member who then requested a meeting to hear all points of view. Since the meeting focused on an active operation in the currently approved FMP, it was not deemed within scope of the 2021 FMP LTMD and therefore not reflected in the record of public comments for the 2021 FMP.
- b. The LCC and planning team which includes District and Regional Biologists designated to the Bancroft Minden Forest are aware of the studies conducted by AFER. As discussed at the meeting on October 13, 2020, MNRF biologist are currently reviewing these reports. They are aware of your request to follow up should they have any questions or comments.
- c. We invite students who visit the Bancroft Minden Forest who are interested in logging practices to engage with registered professional foresters and other professionals in the sector to gain a greater awareness of the sustainable practices employed to manage forested stands like those present in the Catchacoma forest.
- d. Trails and their protection are out of scope of the LTMD and will be addressed through the next phase of public consultation (operational planning). However, we would like to comment that our Conditions on Regular Operations (CROs) in the current 2011 FMP (see section 4.2.2.14) states that designated trails e.g.) those identified in the Ontario Government Land Information Ontario Database will be returned to their original condition or found state as a minimum after completion of operations. All other trails will be taken into consideration under the Good Neighbor Policy (see section 4.2.2.2.15) which recognizes the interests of other stakeholders and strives to ensure existing access is not unduly affected. Both of these CROs for trails will be carried forward into the 2021 FMP during operational planning. Compliance inspections are done by both MNRF and BMFC staff on harvest blocks to ensure adherence to the AOCs and CROs. Before an identified operational issue becomes a non-compliance, corrective actions are determined. Only if these corrective actions are not completed the issue will be recorded as non-compliance, and any non-compliances are recorded in the annual reports. If you have concerns about the state of the current trails system after recent harvest activity, we encourage you to reach out to Bancroft Minden Forestry Company technicians so they can follow up.

2. Issues with the proposed LTMD:

a. The LTMD projects a forest condition where hemlock (HESH) forests decline in the short term with a consistent increase afterwards for the next 100 years. While not ideal, the LTMD creates a solution that must balance dozens of objectives with several individual indicators. For example, Old Growth is measured in 9 different ways, with HESH being only one element of the whole. The LTMD increases the overall Old Growth representation on BMF by over 20,000 hectares in the short term, 40,000 in the medium term and nearly 60,000 hectares in the long term. In that context, a 19 hectare drop from Plan Start in the short term for a single element of Old Growth represents a small decline in an overwhelming positive trend for Old Growth. Additionally, the HESH Old Growth trends show that an additional 250 hectares of Old Growth HESH will be represented on the landscape over the next 20 years and 3000 hectares over the next 100 years, meaning that the decline is not only slight, but also temporary. The overall Old Growth trends in the LTMD are moving towards a greater representation of Old Growth through time and the HESH is included in that trend. Thus, the benefits of Old Growth mentioned (such as habitat, genetic diversity or carbon sequestration) are provided at *a landscape scale in the long term*, which is the goal of the LTMD. Thank you for recognizing the importance of exploring the rationale and justification behind the short-term decrease in old growth hemlock within the LTMD model output that was the agreed by the planning team to be a balance of objectives. In order to satisfy your concerns on this matter, a required alteration to the plan was added to the Final List of Alterations (list available at draft plan) to provide a detailed rationale for this decrease, similar to the description above, which will be included in the analysis package that accompanies the LTMD summary.

b. Irregular shelterwood is an approved silviculture system in the MNR Forest Management Guide to Silviculture in the Great Lakes-St. Lawrence and Boreal Forest of Ontario (2015) and is described as a suitable treatment for managing eastern hemlock. A summary of the rationale for choosing irregular shelterwood is provided below. The lead auditor conducting the 2017 Independent Forest Audit on the Bancroft Minden Forest recommended we explore the use of irregular shelterwood as it best describes the types of silviculture commonly practiced on the Bancroft Minden Forest. Irregular shelterwood is generally used for regenerating species that are tolerant and semi-tolerant of shade resulting in an uneven aged structure that is not uniform (as in uniform shelterwood) or balanced (as in single-tree selection) and maintain or increase attributes of old-growth forests.

It is not a requirement to include a detailed description of forest units and modeled silviculture systems in the LTMD summary, however the Planning Team has discussed this change at length and has documented the rationale which will be available to the public during Stage 4 of Public consultation (Draft Plan). The primary motivation for modeling hemlock using irregular shelterwood is the threat of the invasive hemlock woolly adelgid (HWA) - which has recently been observed in Canada – and the promising results of research trials in the U.S. which have demonstrated that thinning of hemlock stands under threat of HWA have allowed them to survive much longer.

BMFC is part of a provincial hemlock woolly adelgid (HWA) working group headed by Silv-Econ with over 50 members, mostly forest and land managers from across the Province and also part of a smaller sub-group that focuses on silvicultural options for managing hemlock under threat of HWA, which includes SFL representatives from the GLSL and MNR representatives. Using the most recent available science and information gained from membership in this group, we have developed a silvicultural strategy that aims to build resilience in hemlock dominated stands. As with any silvicultural management decisions, we are continuously adapting as we adopt new science and best

practice and reflect on our efforts from experiential learning. Below is an excerpt of the rationale to describe our strategy for hemlock management in the 2021 FMP:

Contemporary silvicultural approaches relevant to forest health operate under the principle that host susceptibility or suitability may be influenced by pre-emptive management and silviculture practices that increase vigor, reduce competition, and adjust species composition to minimize host abundance. These practices target the host and not the invader. Based on these principles, our silviculture strategy for hemlock will focus on thinning and promoting diversity of both structure and species. Hemlock can respond to thinning regardless of age if live crown ratio is greater than 30%. Stems with the highest quality and live crown ratio will be selected and given a 2-3 sided release by removing adjacent and lesser quality stems. The retained vigorous, fast growing trees are better positioned to resist damage from HWA. Although the prime objective of thinning is to assist hemlock stems in resisting HWA, a second advantage will be a healthier, better quality, faster growing stem. Even if HWA never establishes itself in the Bancroft Minden Forest, this silvicultural strategy should help build a healthier, more diverse forest that can still provide critical thermal cover and wildlife habitat.

We counter that the risk of doing nothing and not managing hemlock for resilience to the HWA is not a prudent approach when we have tools that can help ensure the sustainability of hemlock stands on the landscape.

BMFC surveys all harvested stands for silviculture effectiveness monitoring and reports a 100% regeneration success record, and the MNRF does spot-checks to verify.

c. While protection of identified values is part of operational planning, we would like to reiterate that MNRF annually reviews areas scheduled for forest operations, or otherwise identified by the SFL to be an operational priority, to identify areas with known values or high potential for values. Values surveys are conducted on a priority basis as per Fish and Wildlife Values Collection and Mapping in Forest Management Planning: A Southern Region Strategy (2020). Surveys target species that are likely to be impacted by forest operations and are likely to occur at a site. On the Bancroft Minden Forest, this means we primarily focus on Blanding's turtles, American ginseng, and S1, S2, and S3 ranked species. Areas of concern are applied as necessary based on the results of these field surveys, and other verified observations. Blanding's turtle habitat has been delineated based on an observation on County Road 507. Block 1711 was identified in the 2019 and 2020 reviews as medium potential for Blanding's surveys based on some habitat present that could not be delineated based on known observations. There is low likelihood of ginseng or S1-S3 ranked plant species occurring. More information about the values collection and AOC delineation processes can be provided by Bancroft District MNRF staff, if desired.

BMFC and MNRF share responsibility for compliance reporting. BMFC staff has conducted multiple compliance inspections and have not reported any infractions, which has been verified by MNRF through a formal inspection.

d. Climate change is considered throughout all aspects of the FMP process, which focuses on adaptive management. A variety of policies and guides provide direction to the planning team to aid in achieving healthy and resilient forests. In particular, the Old Growth Policy for Ontario's Crown Forests, is used to ensure that old growth conditions and values are present in Ontario's Crown forests in order to conserve biological diversity at levels that maintain or restore ecological

processes, while allowing for sustainable development now and in the future. Additionally, the Desired Forest and Benefits Meeting report outlines several strategies that the planning team has considered to employ with respect to climate change mitigation. We encourage you to read this report that was sent to you via e-mail on September 24th of this year.

The planning team has considered your input and hopes that you are satisfied with our response to your concerns, but please reach out to the planning team if you have any further questions or comments. Also, we encourage you to stay engaged in the FMP process as further opportunities for public consultation will be available at Stage Three: Operational Planning, and Stage Four: Draft Plan of the Forest Management Planning Process. Stage Three is expected to occur this winter and Stage Four is expected to occur in the spring of 2021.

Sincerely,

Sent on behalf of the members of the 2021-31 Bancroft Minden Forest FMP Planning Team and Local Citizen's Committee

Suzy Shalla
A/District Manager
Bancroft District MNRF