

May, 2020

To [organization or individual]

RE: Sign-on to letter to pursue protection for Catchacoma Forest in Peterborough County

Who We Are

The Catchacoma Forest Stewardship Committee (CFSC) is a recently formed group exploring options to pursue protection status for a 662-ha stand of crown land forest known as the “Catchacoma” forest, located north of Catchacoma lake, west of the Kawartha Highlands and east of Highway 507 (see attached map). Ancient Forest Exploration & Research (AFER) has found that this landscape is the largest known old-growth eastern hemlock forest in Canada. We are seeking assistance from local organizations and individuals who may be interested in this matter.

Conservation Values

A portion of the Catchacoma forest was studied by local ecology group AFER in 2019 as part of an effort to document old-growth forests within Peterborough County. That research indicated high conservation values for the forest, including the presence of dominant old-growth hemlock trees (over 140 years) and other old-growth qualities. Hemlock-dominated forests are one of the rarest types of forest in southern Ontario, and are on the decline. In addition to its unusually large size, research has uncovered the presence of ten species-at-risk and the potential for more at-risk species there. In addition, the stand as a natural forest helps to protect important water sources for Catchacoma Lake, protect against climate change and invasive insects, and also has cultural values including education, research and recreation.

Logging in Catchacoma

The Catchacoma Forest is leased by the province to the Bancroft Minden Forest Company (BMFC) for logging, and the company’s management practices are reviewed and evaluated by the Ministry of Natural Resources and Forestry (MNR). This past winter, selection logging and road building occurred within the stand and the plan released by BMFC for next year indicates more logging is scheduled for 2020-21.

While we acknowledge that selection logging, which limits harvest to 30-40% of mature trees, is less invasive than shelterwood and clearcut logging, we are concerned about the impact this logging will have on the old-growth qualities and species-at-risk habitat in the forest, especially with the additional impacts of road building. We also have cause for concern based on independent audits of past logging operations that have indicated deficiencies in identification and communication of the location of species at risk habitat by MNR. CFSC believes that further on-the-ground studies are needed to gather more information about the ecological values of this forest. A recent research report by AFER shows that the Catchacoma Forest is ten times more valuable to society as a “natural”, unlogged landscape compared with its timber value for mulch and pallets.

Potential Means of Protection

Ontario’s Protected Parks and Conservation Areas Act established the value of setting aside natural areas for management for the highest possible ecological integrity rather than for industry. There are many ways to achieve protection status through MNR and the Ministry of Environment, Parks and Conservation (MECP). While we are pursuing these options, they are time-consuming and the process is unclear and under-funded.

Meanwhile, next year's logging will surely diminish the ecological values that make this forest unique at the national level.

Conservation through FSC Certification Standards

In addition to pursuing the Ontario government route, we are also pursuing a more expedient approach through the forestry company's certification with the Forest Stewardship Council (FSC). FSC certification is a national and international certification standard that allows logging companies to market their products as sustainably harvested. BMFC has been FSC-certified since 2011.

FSC Canada recently produced new standards, one of which requires certified companies to actively assess their management unit for high-conservation value sites to designate as conservation areas to be set aside from logging, and to use their influence with the province to achieve legal protection status for these areas. Certified companies are required to involve self-identified interested stakeholders in the process. The deadline for companies to show movement towards fulfilling this standard is January 2021.

To begin our investigation of this new standard, we have written a letter that we will email to the manager of BMFC with the following purposes.

1. We request to be informed of the company's plans and processes to meet the new FSC designated conservation areas standard.
2. We wish to establish ourselves as interested stakeholders in these processes.
3. We suggest that the Catchacoma site be considered for a designated conservation area.

This is only a first step, but we hope it will help kickstart the process and keep ourselves informed and engaged.

Please find the letter attached--it is written in specific language to conform with the language in the FSC standard. **We are asking you and/or your organization to sign on to this letter to establish yourself/your group as an interested stakeholder.** This only means that you will stay informed of the process and does not require any specific actions.

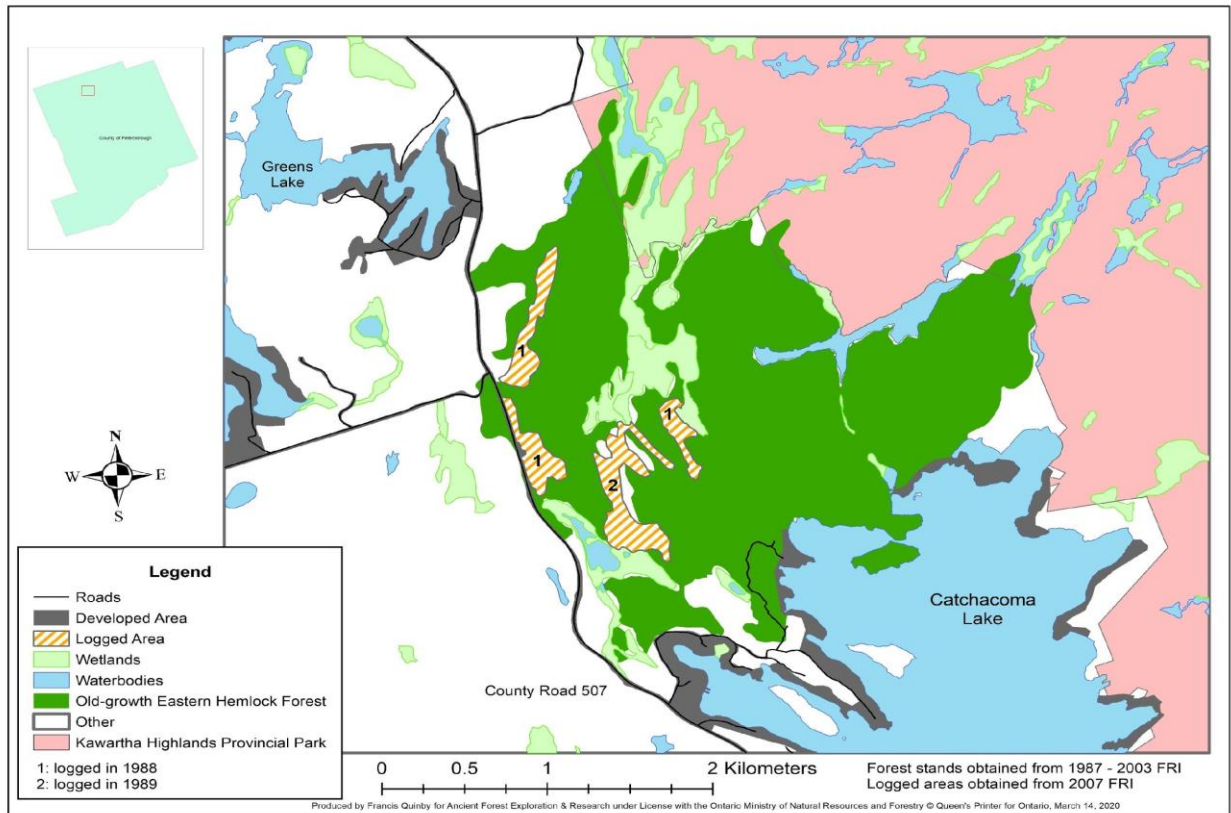
Thank you for your attention to this matter! We are happy to answer any questions you might have in considering our ask.

Sincerely,

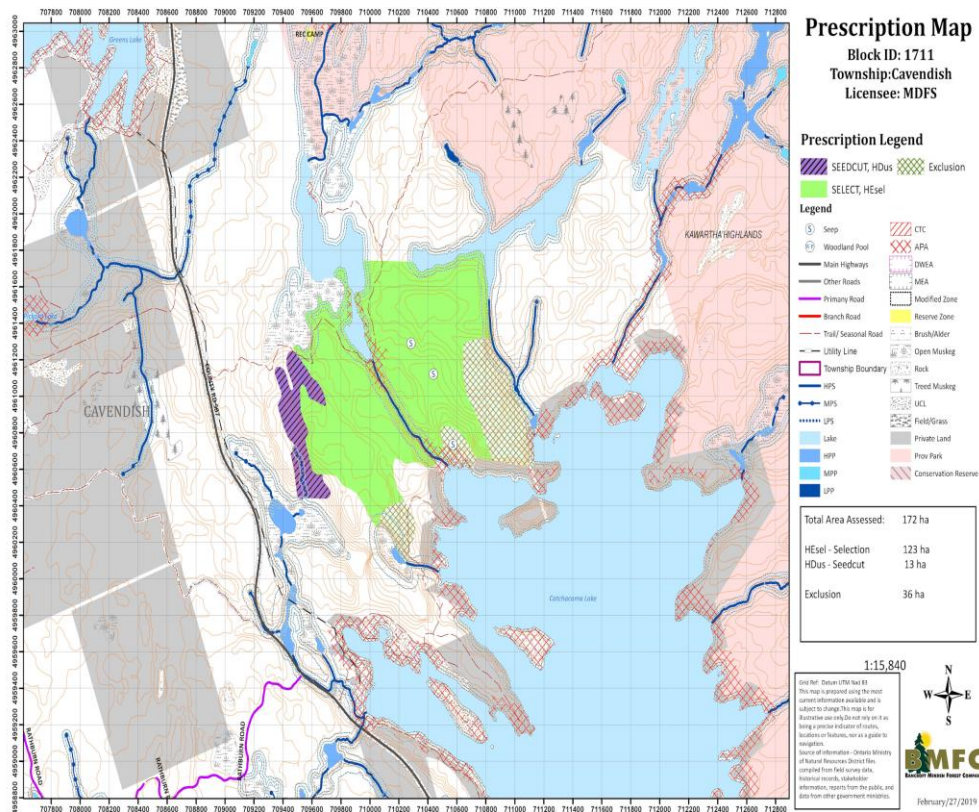
[Name]

On behalf of Catchacoma Forest Stewardship Committee

Map showing extent of the 662 ha Catchacoma old growth hemlock forest, with previously logged areas (produced by AFER, using MNRF data)



Planned Logging Area for the Catchacoma Forest, from BMFC Annual Operations Plan 2020-2021



Dear BMFC Forest Manager:

As you are no doubt aware, the Forest Stewardship Council (FSC) of Canada launched a new Forest Management Standard to support certification for responsible forest management in June 2019. The new standard came into effect on January 1, 2020. We are writing to express interest in Bancroft Minden Forest Company's progress towards implementation of the standard [Indicator 6.5 "Conservation Area Networks"](#).

This indicator requires that FSC-certified organizations "identify and protect representative sample areas of native ecosystems" in an effort to fill gaps in the existing conservation area networks within their management unit. These designated conservation lands, previously known as candidate protected areas, are "to be managed through the exclusion of forest management activities in recognition of their ecological and/or cultural values". The standard further clarifies the long-term objective of designated conservation lands is to transition them to legal protected status and that the company must work from within its sphere of influence to achieve that objective.

In pursuit of the achievement of the standard, FSC requires companies to **initiate a process to identify gaps in the conservation area network, including a gap analysis by one or more independent experts and a peer review**. For forests managed on public land, it requires the company **undertake an engagement process with Indigenous Peoples and self-identified stakeholders regarding the analysis, designation and management of new conservation areas, including a process to achieve consensus**.

In light of this standard, the individual and organizational signatories to this letter wish to identify themselves as interested stakeholders for involvement in this process within the Bancroft Minden Forest Company management unit. We are interested in the process in general, and in particular, we are interested in proposing the Catchacoma forest (block 1711) of the management unit for consideration as a designated conservation land. We believe this stand to have high conservation values including the presence of various species at risk, as well as representing a rare and declining native ecosystem with old-growth qualities. Its location as adjacent to other already protected areas could add to landscape connectivity. The forest also has cultural values. The accessible location has proved to have educational value within the community; it has been employed for learning opportunities and research by Youth Leadership for Sustainability high school classes as well as by non-profit group Ancient Forest Exploration & Research. It is also used locally for hiking, trapping, fishing and snowmobiling.

While the FSC standard cites 10% of the management unit as a minimum goal for the size of the Conservation Area Network, it also stresses that the 10% goal should not be interpreted as a maximum or necessarily desirable level. It explicitly acknowledges that there may be instances in which a more extensive network is warranted based on factors considered in the gap analysis and other high conservation values. These efforts should also consider that the federal government has committed to increasing the amount of protected area in Canada to 30% of the landscape.

Considering that the [2011 independent audit of BMFC](#) states that "the Bancroft-Minden Forest may be home to more species-at-risk than any other forest in the province", we feel that the Conservation Area Network within this unit may warrant a larger percentage of designated conservation lands. At the very least, a new gap analysis is required that includes High Conservation Values and High Conservation Value Areas (FSC Standards, 2019, 6.5.2).

We would like to commend Bancroft Minden Forest Company on its commitment to responsible management through FSC certification, and we look forward to contributing to the process of identifying ways to add to the conservation network.

Signed,

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