

Ministry of Natural Resources and  
Forestry

Ministère des Richesses naturelles et des  
Forêts

**Bancroft District Office**  
PO Box 500  
106 Monck Street  
Bancroft, ON K0L 1C0  
Telephone: 613-332-3940  
Facsimile: 613-332-0608

**Bureau de district de Bancroft**  
Boîte postale 500  
106, rue Monck  
Bancroft, ON K0L 1C0  
Téléphone: 613-332-3940  
Télécopieur: 613-332-0608

March 5, 2021

Joe Natalie  
President, Catchacoma Cottagers Association  
(416) 432-5636

**Re: CCA Comments on the Proposed Operations stage of the Forest Management Planning for the 2021-2031 FMP for the Bancroft-Minden Forest**

Dear Mr. Natale,

Thank you for your letter on January 29<sup>th</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 concerns and recommendations.

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. Please see Ontario's Tree Marking Guide for more information on prescriptions to retain old growth characteristics.

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. Block 3710 is now in Contingency harvest, and therefore it 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. At this time, the Planning Team has decided not to remove Block 2749 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 have been developed. Operational prescriptions for areas of concern have been developed for all harvest, renewal and tending, and protection areas. Areas of concern conditions have been developed for all roads, landings, and forestry aggregate pits for the 10- year period. The Forest Management Planning Manual (FMPM, 2020) Part A, Section 1.3.5.2 provides direction for silvicultural ground rules and conditions on regular operations for harvest, renewal and tending operations.

In terms of CFSC's 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 Crown Forest Sustainability Act (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 the request to create a conservation area within the Catchacoma area or provide a moratorium on logging in that area, we would like to identify that 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). MNR'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. MNR 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.

In response to the request for the MNR to conduct surveys in the Catchacoma area, please note that the MNR 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 MNR 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 Sustainable Forest License holder (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 Areas of Concern (AOCs) are not applied) prior to harvest operations commencing. For the wildlife values that are identified through these surveys, the planning team has developed Area of Concern prescriptions in line with the Forest Management Guide for Conserving Biodiversity at the Stand and Site Scales (Stand and Site Guide) to protect those values.

Please note that Draft Plan materials, including a discussion of how the balancing of social, economic and environmental objectives are being considered and achieved throughout the development of this Forest Management Plan will be available for review online on NRIP during Draft Plan review from March 19-May 17, 2021. We hope that this letter adequately addresses your concerns and the Planning Team and encourage you stay engaged and thanks you for your input to the Bancroft-Minden 2021-2031 FMP.

Sincerely,

Corinne Arthur, RPF  
Regional Planning Forester  
Ministry of Natural Resources and Forestry  
Southern Region

Ernie Demuth, RPF  
Management Forester  
Ministry of Natural Resources and Forestry  
Bancroft District

- c. Municipal Council Trent Lakes
  - Carol Armstrong – Councillor Galway-Cavendish Ward, Trent Lakes
  - Dave Smith – MPP, Peterborough Kawartha
  - Maryam Monsef – MP, Peterborough Kawartha
  - Svetlana Zeran – Bancroft Minden Forest Company Inc.
  - Jane Dumas – Bancroft Minden Local Citizens Committee
  - Federation of Ontario Cottagers Associations