

To: Corinne Arthur  
Regional Planning Forester  
Ministry of Natural Resources and Forestry

From: Catchacoma Forest Stewardship Committee (contact: [katie@wildernesscommittee.org](mailto:katie@wildernesscommittee.org))

Re: Submission to Review of Proposed LTMD for Bancroft-Minden Forest Unit  
Date: October 14, 2020

SENT BY EMAIL

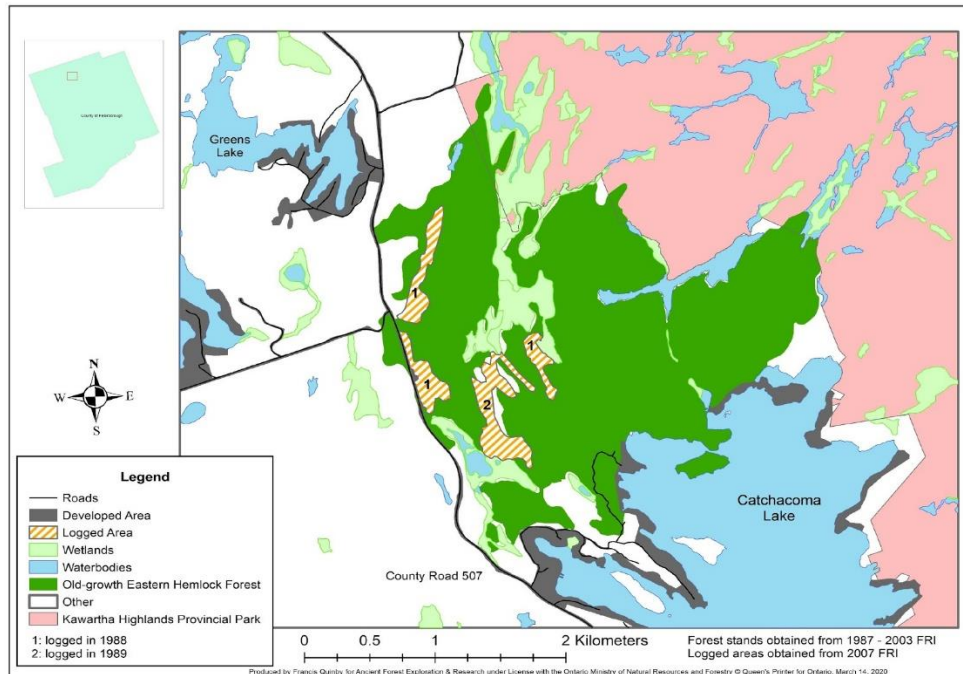
Dear Ms. Arthur,

Please accept this written submission to the review of the proposed LTMD for Bancroft-Minden forest management, as per the process for the development of the 2021-2031 FMP on behalf of the Catchacoma Forest Stewardship Committee (CFSC). The CFSC was established to pursue protection status for an eastern-hemlock dominated stand on crown land within the management unit of BMFC, north of Catchacoma Lake, bordering on Kawartha Highlands Provincial Park to the east, Highway 507 to the west and stretching north to Pencil Lake (see map below). We call it the Catchacoma Forest.

Eastern hemlock forests are very rare throughout their natural range in eastern North America, so much so that we believe all remaining old-growth eastern hemlock stands should be protected. This includes the Catchacoma Forest, which happens to be the largest known stand of this type remaining in Canada.

This roughly 660 ha (1,650 ac) forest was recently studied by ecologists and biologists with the non-profit group Ancient Forest Exploration & Research (AFER) and was found to be the largest known mature and old growth eastern hemlock forest in Canada, with significant conservation values, including habitat for a minimum of 10 species at risk, recreational hiking trails, and educational and research uses. There are also several wetlands within the stand including fens, swamps, bogs and Pencil Creek which feed into Catchacoma Lake and are currently unevaluated for regional and provincial significance.

**For these conservation value reasons the CFSC recommends an immediate moratorium on logging in the Catchacoma Forest (unit 1711 of the FMU) in order to first conduct wetland evaluations, an environmental assessment and an updated species at risk assessment.**



Following our meeting on October 13, 2020 with your planning team that focused on the proposed LTMD, the CFSC continues to have concerns and issues with MNR's long-term direction for the Catchacoma Forest and the conservation values in the conservation values contained within it outlined below.

1. Consideration of studies and reports submitted by AFER
  - a) As discussed at our meeting with the Planning Team (PT) on Oct. 13, 2020, we are concerned that the record of public comments thus far in the planning process (provided as supplemental documentation to the proposed LTMD) has not included reference to the meeting held between BMFC, MNR and our members on February 13, 2020 to present AFER's findings of conservation values in the Catchacoma Forest, and that our requests for information regarding AOCs identified in block 1711 and records of past logging on the site, including where, what and how much was logged, as well as what monitoring was done prior to that past logging. These requests have yet to be answered.
 

**We request that the summary of public input be updated immediately to include reference to that meeting, the AFER studies presented, as well as our follow up emails seeking information, and all emails subsequently sent requesting an immediate moratorium on logging in the Catchacoma stand.**
  - b) Pursuant to this, we are attaching a link to the AFER studies and reports on the Catchacoma Forest prepared thus far. We expect these to be shared with the full membership of the Planning Team and LCC, as well as relevant MNR biologists to be considered in preparation of the draft FMP. **We also request that Planning Team and MNR considerations of these conservation values be communicated with us prior to the publication of the draft FMP.**

**Link to AFER studies: <https://www.peterborougholdgrowth.ca/reports>**

We are happy to provide these reports in pdf form upon request, as well as answer any questions regarding them.

- c) In addition to the ecological values described in the AFER reports, the Catchacoma Forest also has educational and research values—mainly by being highly and uniquely accessible for students in the Peterborough area. To substantiate that value, we submit a statement from one of the members of CFSC, Cameron Douglas, who is a teacher and program coordinator with Youth Leadership in Sustainability and has brought his class to the forest to study old growth:

*“The Catchacoma Forest field work has had a significant impact on the senior high school students I work with. We spent 3 full days in the forest last fall, involved in old growth survey metrics, ecosystem study, and nature appreciation. Students now understand what “old growth” is, and how it is assessed/identified. While students fully appreciate the need to harvest trees, and the role that this plays in our economy, they also now understand that not all forests represent the same ecological processes, and that old-growth characteristics can be threatened by harvest. These students also now better understand the forest management planning system, and the role of FSC certification in guiding the planning process.*

*Students were in awe of the ethereal feeling that this old growth hemlock forest evoked. The lack of understory gave clear view ahead with the light filtering through, and the presence of the large trees was a first time experience for many of them. This class went on 26 field trips last fall, and the Catchacoma Forest was their favorite place to be.*

*Our final (January 2020) trip was the most difficult, as student came to terms with the cutting that was underway. They were surprised that a forest with such unique characteristics, belonging to a threatened ecosystem type was not set aside for further study before harvest.*

*One might argue that students are “naïve” and of course like big old trees. And that as soon as they start working, they will realize the economic imperative of cutting forests. But I see this in a different light. High school students have not had to “accept” that forests like this need to be cut down, and offer adults an opportunity to step back, and take another look. Just because we’ve always done it this way, doesn’t mean we need to always do it this way. The fresh set of young eyes and hearts that were engaged in the forest last year should help us understand that there are other priorities.*

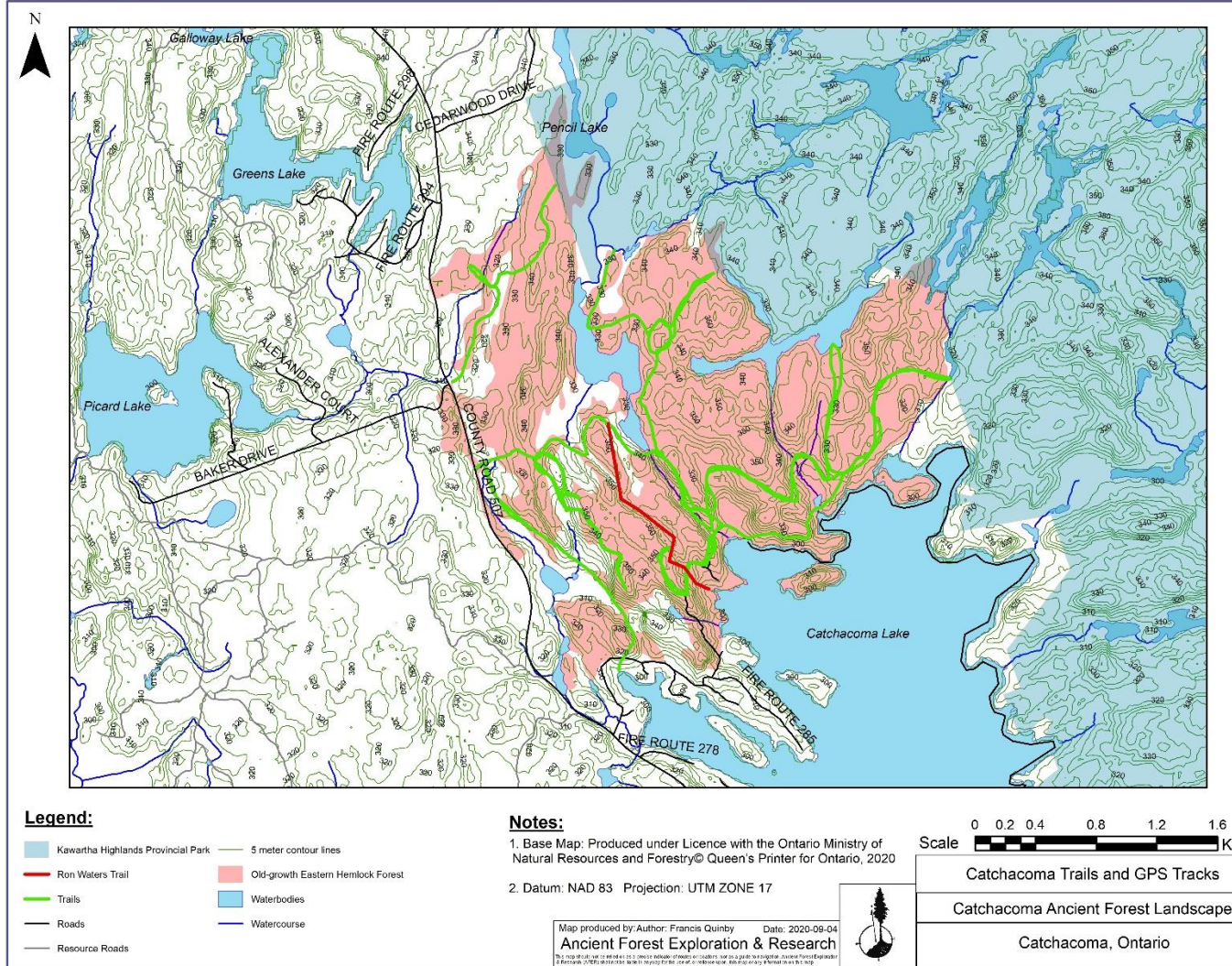
*Yes, let’s cut down trees. But there are many many other forests that do not have the same ecological values as this one does.,*

*I plan to continue taking my classes to this teaching forest (in fact, we will be there Tues Oct 20<sup>th</sup>). We will look at the old growth area, and will look at the cut areas. We will discuss the logging practices engaged. But I know, from being in the forest with some of them in February after cutting had gone through the portion that we surveyed, that something has been lost, in their view. Yes, it is valuable to study forest harvest methods and impacts. But this can be done anywhere – and I would so much rather be exploring an old growth forest with them at Catchacoma.”*

Cam Douglas  
Project Coordinator  
Youth Leadership in Sustainability  
Kawartha Pine Ridge District School Board

- d) The CFSC also wishes to submit for the record our concern for the recreational values of the Catchacoma Forest, specifically hiking trails that are used by locals to enjoy the forest, including our members and supporters. Already, one of these trails has been destroyed through logging

operations in winter 2020. From what we understand, the recreational value of these trails that offer accessibility to appreciate the old growth forest, are not acknowledged either in the past FMP or the LTMD and we request they be considered in development of the new FMP. We provide a recent map of hiking trails in the forest, as developed by biologists contracted by AFER. (hiking trails noted by green and red lines) :



## 2. Substantive Issues with Proposed LTMD

- a) As discussed in our meeting with the PT on October 13, 2020, we feel that the SNRV modelling for old growth and mature hemlock documented in the proposed LTMD Table FMP-10 support AFER's reports asserting the rarity of this forest type on the management unit landscape. This table shows the current level of old growth hemlock to be 752 ha, well below the desirable level of 3,620 - 5,420 ha, and also the lowest representation of all other old growth types other than red pine. The stated management objective is to increase the amount of old growth hemlock towards the desirable level, and yet the 10-year projection shows a *decrease* of old growth hemlock to 733 ha. Of all of the other old growth types with the objective of increasing

towards mean, HESh is the only category that shows a decrease in the short term. While a decrease of 20 ha may be regarded as a unsubstantial, in light of the low starting representation of old growth hemlock on the landscape, we submit that it is substantial in proportion. There are also references in the past FMP for BMFC that indicate the limitations of the FRI and SNRV modelling to adequately project for uneven-aged old growth forest. Specifically, we point to this passage from the past FMP, p. 129

*“The Forest Resource Inventory (FRI) provides approximate ages for selection forest unit areas, however, due to the “all-aged” nature of these areas, they are not expected to be representative of actual forest conditions. For the purpose of a forest inventory, the forest would likely be aged according to the average condition of trees present, however, somewhere along the road to digitization the inventory for the Bancroft Minden Forest had all selection-managed areas (at the time hardwood was the only selection forest unit) set to “99”, making age a measure of limited use for HDesel. Also, age is not updated in the inventory following a partial harvest, since normal selection harvest practices retain the structural component of uneven-aged stands and ensure that there is retention of all size and age classes present before harvest. For these reasons, it is difficult to quantify the area currently in uneven-aged old growth, as well as any sort of future projection.”* This inadequacy of the FRI and SNRV modelling is even more prevalent for uneven aged old growth hemlock, since during the last FMP no such units were evaluated.

**Therefore, we find this projected decrease of old growth hemlock in the short term unacceptable given the value of this forest in maintaining ecological habitat for forest dependent species, carbon storage and sequestration, water cooling, maintaining genetic biodiversity, etc. Thus we reiterate our request for an immediate moratorium on logging in the old growth Catchacoma Forestst, which represent 88% of the existing old-growth hemlock forest remaining in the BMFC management unit.**

- b) We also have concerns with the mention of a new type of silviculture applied to hemlock identified in the proposed LTMD—namely, a shelterwood system—which does not appear in the last FMP 2011-2021. From our understanding shelterwood silviculture is mainly applied to maintain/produce even-aged forests and not for uneven-aged forests, such as the Catchacoma old growth hemlock stand. In the last FMP, the only type of silviculture mentioned for uneven-aged hemlock stands is the selection system. See references:

(p. 26-27, FMP 2011-2021) *Hemlock (HDesel) The hemlock selection forest unit makes up a small proportion of the productive forest landbase, at just 3%. The forest unit is made up of one Landscape Guide Forest Unit: HE1 (Hemlock). The average site class is 2 and average stocking is 0.82. The average species composition includes representation of a variety of species, but is dominated by hemlock, followed by hard maple and other tolerant hardwoods. The majority of the area in HDesel is found on ecosites 23, 28 and 30. Ecologically, hemlock is an important species in deer yards and provides browse, thermal cover and snowbearing capacity in different stages of development and distribution. When sound, the wood is desirable for decking and flooring where resistance is important, dock cribs, ties, structural timber for barns and bridges. Hemlock is very shade tolerant and is managed using the selection system.* Left undisturbed, it is expected to regenerate in gaps created by wind events.

*Uneven-aged Old Growth: There are three uneven-aged forest units in the Bancroft Minden Forest: the hardwood selection forest unit (HDesel), the hemlock selection forest unit (HDesel) and the cedar selection*

*forest unit (CEsel). Selection and group selection management in these forest units emulates single and multi-tree disturbance gaps created by trees dying and windthrow in the tolerant and mid-tolerant hardwood forests of the Great Lakes – St. Lawrence Forest.*

To propose a new silviculture method for this last existing old growth eastern hemlock uneven-aged stand in the forest management unit without any rationale, analysis, data or plan is unacceptable. We have already reached out to the SFL to inquire as to such analysis, rationale and plan and have yet to receive an answer. Our concern is that applying a shelterwood cut to old growth hemlock will create too large of gaps and undermine the closed canopy, cooling effect, and snow protection that makes old growth hemlock such a unique ecosystem. Our concern is also supported by Finding #7 from the recent Bancroft-Minden Forest Independent Forest Audit, 2011-2017 (2018) that “*there is inconsistent silvicultural effectiveness monitoring (SEM) data collection, compilation, analysis and reporting procedures between the SFL and MNRF*” (p.v).

**We therefore submit that it is potentially unsustainable and risky to subject such a rare and unique ecosystem to experimental silviculture without a thorough analysis that compares any such proposed silviculture process to a “do-nothing” approach of not harvesting this unique forest.**

- c) Objective Assessment: Protect the habitat of forest dependent species at risk with known occurrences on the Bancroft-Minden Forest.

The only assessment of this objective is given in the LTMD as “*zero non-compliance reports for SAR species and AOC requirements*”. However, given the last two independent audits of the BMFC operations, both of which point to a lack of timely SAR and AOC identification in time to affect operations gives us ample reason for concern. In addition, the 2011-2017 Independent Audit stated the following:

*“the number of high-risk operating areas that have not been inspected by MNRF compliance inspectors is increasing over time. The number of compliance inspections performed by MNRF on the BMF during the audit term has fallen from a high of 23 in 2011- 2012 to a low of 4 in 2016-2017 (source: AR-6 and MNRF/SFL for 2016-2017). The actual number of compliance inspections each year fell well short of planned inspections by 50% or more except for 2011-2012”* (p.10)

**Therefore, we submit that MNRF expedite the on-the-ground identification of SARs habitat and AOCs for the Catchacoma Forest, and communicate to the CFSC how they will institute compliance inspections for recent logging activities there in 2020, and scheduled for 2021 and how they will ensure that compliance inspections will be increased for this area, if harvesting is continued.**

- d) Climate Considerations

The only climate consideration in the objective considerations for the BMF is “In a changing climate, maintain or improve the ability of forests to resist pests & pathogens.” The only objective assessment given for this consideration is “Bi-annual operator training to educate operators about emerging invasives & mitigative strategies”. (FMP-10). There is zero consideration in the LTMD to the value of intact, old growth forests to “climate considerations”, foremost of which is the contribution of old growth trees, and old growth soil conditions, to carbon storage.

Also an analysis of the contribution of old-growth forest to cooling of waters and land is lacking. It is disappointing to not see this considered in the climate mitigation strategies of forest management plans. In addition, the unique location of the BMF in a “transition” ecosystem which contains many “edge of range” species and ecosystems is not acknowledged in the LTMD. **The CFSC expects to see these considerations of climate change mitigation ability of old growth forests and species habitat considered in the FMP.**

We sincerely hope that your planning team will give serious consideration to the conservation values and rarity of the Catchacoma Forest in both the review of the LTMD and in developing the FMP, and that there are some forests who’s ecologically contributions out-weigh their timber harvest values.

Sincerely,

Catchacoma Forest Stewardship Committee.

CFSC members:

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This submission is also endorsed by Mitty Van der Velden ([mittivan@gmail.com](mailto:mittivan@gmail.com)) and Joe Natale ([jvz5000@aol.com](mailto:jvz5000@aol.com)) , past and current presidents of the Catchacoma Cottagers Association on behalf of the CCA.