

Date: December 4, 2019

To: Hon. Minister John Yakabuski
Ministry of Natural Resources and Forestry
Whitney Block 6th Flr Rm 6630
99 Wellesley St W
Toronto, ON
minister.mnrf@ontario.ca

SENT BY EMAIL

cc'd Senior Policy Advisor and Stakeholder Relations: Jake.Sikora@ontario.ca
cc'd Peterborough District Manager: hal.leadlay@ontario.ca

RE: Unprotected - Canada's largest known old-growth eastern hemlock forest in Ontario

Honourable Minister John Yakabuski,

We are writing on behalf of [Ancient Forest Exploration and Research](#) (AFER), [Peterborough Youth Leadership in Sustainability](#) (YLS) and the [Wilderness Committee](#) (WC) to urge you to use your position as Minister of Natural Resources and Forestry to **issue a moratorium on logging in a recently-identified unprotected stand of old-growth eastern hemlock forest situated on crown land in Peterborough County, Ontario north of Catchacoma Lake** (see map Appendix A).

We believe that we have identified the largest known old-growth eastern hemlock stand in Canada. Two of the next three largest old-growth eastern hemlock forests are considered significant at the provincial level and are protected as nature reserves (see Appendix B). The natural capital value of this forest was calculated at \$1.7 million per year compared with a fiber extraction (logging) value of \$100,000 per year.

This stand is an excellent candidate for an area of natural and scientific interest, nature reserve designation or annexation to Kawartha Highlands Provincial Park. It should be protected intact for its natural heritage and scientific interest values, and for its ecosystem services including carbon storage and sequestration, and habitat for species-at-risk (SAR). We write with urgency as this stand is imminently scheduled for logging activity. This endangered forest landscape could be a signature Ontario effort to meet the 17% land protection by 2020 target.

The Catchacoma old-growth stand was inventoried by researchers with AFER in collaboration with a high-school class from YLS this fall (2019) using standard forest science protocols for old-growth forest assessment and from qualitative assessments. These field studies were funded by an Ontario Trillium Grant. Using Ontario Forest Resource Inventory data, we determined that the size of the stand is 550 ha. Comparing this size to data on known hemlock-dominant stands across Canada we concluded the **Catchacoma forest is the largest contiguous natural (old-growth) eastern hemlock-dominant forest in all of Canada** (Appendix B).

In addition, our research found that this stand represents an endangered forest type, based on differences in Forest Resources Inventory data across years (see Appendix C). The forest also has documented observations of Ontario species at risk including 5-lined skink, bald eagle and

eastern wood pee-wee. There are potentially 24 more SARs that use the Catchacoma Forest as habitat (see Appendix D).

We are currently pursuing the process of designating this site as an Area of Natural and Scientific Interest, however it has come to our attention that **under the Forest Management Plan (FMP) for the Bancroft-Minden Forest, a portion of the stand (including some of the oldest documented individual hemlocks) is scheduled for logging this year** (Appendix E and F).

We believe that had this stand been inventoried prior to the development of the current FMP for Bancroft Minden it would have been identified as having “High Conservation Value”. We also believe a moratorium should be put on logging this stand in accordance with the [*Old Growth Policy for Ontario’s Crown Forests, 2003*](#), which states that, “the objectives for conserving old growth conditions in forest management units are: To identify, consider, and provide for forest age class structure needed to maintain functional old growth ecosystem conditions in forest units for all forest communities.”

We submit that further research is required to determine what those conditions are for this stand. Any harvesting that is done without a full scientific and public assessment could affect the ecological integrity of this unique ecosystem.

In addition, logging activity should be halted under Principle 3.2 of that same old-growth forest policy, which states that,

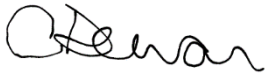
“the impacts and implications of human activities on forest communities present in Ontario and their old growth conditions and values will be identified and mitigated through: an adaptive approach to ecosystem management, coupled with precautionary measures applied to prevent functional changes to ecosystems where uncertainty remains.”

We believe this is a clear instance of uncertainty and therefore precautionary measures should be taken.

Ontario’s *Crown Forest Sustainability Act* provides the Minister with the ability to “at any time, in accordance with the Forest Management Planning Manual, amend a forest management plan that the Minister previously approved” (1994, c. 25, s.11 (1)). We urge you to apply that prerogative in this instance and put a moratorium on logging in the Catchacoma stand effective immediately.

We hope you will consider our request for an intervention into this matter, and we would be happy to meet with you and your staff to discuss our research and our request and to explore how the MNRF can work to protect this unique forest stand. You can reach us by email or phone at the contacts below

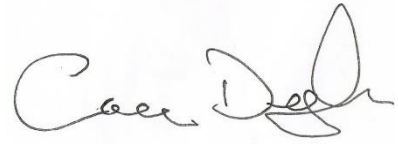
Sincerely,



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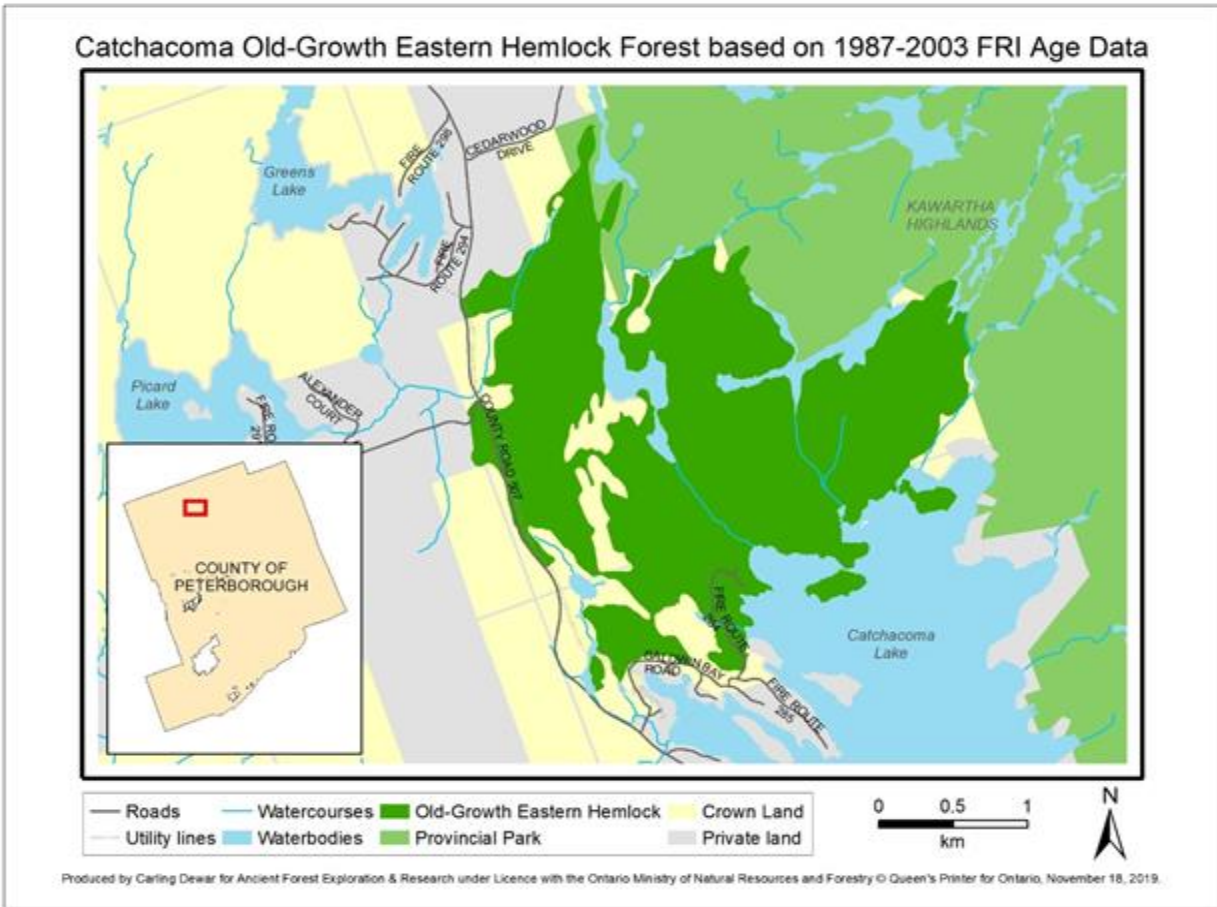


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Appendix A



Appendix B

Documented Old-growth Eastern Hemlock Forests in Canada (prepared by P. Quinby, Ancient Forest Exploration & Research, October 20, 2019)							
Site Name	Province	OG Hemlock Area (ha)	Protected	Amount of Hemlock	Integrity	Notes	Source
Catchacoma Lake Old-growth Hemlock Forest	Ontario	550	NO	dominant species	minor historical logging	provincially significant (unofficial)	www.peterborougholdgrowth.ca
Clear Lake Conservation Reserve	Ontario	453	YES	dominant species	minor historical logging	provincially significant	ontario.ca/page/crown-land-use-policy-atlas
North Tea and Cayuga Lakes Old-growth Hemlock Forest	Ontario	406	partial	dominant species	minor historical logging	provincially significant (unofficial)	www.ancientforest.org
Raganooter Lake Conservation Reserve	Ontario	311	YES	dominant species	minor historical logging	provincially significant	ontario.ca/page/crown-land-use-policy-atlas
DeGaulle Lake Old-growth Hemlock Forest	Ontario	305	NO	dominant species	unknown	provincially significant (unofficial)	www.peterborougholdgrowth.ca
Gold Lake Old-growth Hemlock Forest	Ontario	285	NO	dominant species	unknown	provincially significant (unofficial)	www.peterborougholdgrowth.ca
Algonquin Park (>100 ha; 28 stands)	Ontario	100 - 280	YES	dominant species	minor historical logging	provincially significant	Land Information Ontario (2019); Quinby (2019)
Lost Dog Lake West Old-growth Forest Cluster	Ontario	192	partial	dominant species	minor historical logging	provincially significant (unofficial)	www.ancientforest.org
High Park	Ontario	160	YES	partial	unknown	regionally significant	ancientforest.org/wp-content/uploads/Appendix-2-Table-of-Hemlock-Sites.pdf
Booth Lake Eastern Hemlock Old-growth Forest	Quebec	152	unknown	dominant species	unknown		Villeneuve and Brisson (2003)
Wesleyville Ravines	Ontario	138	YES	dominant species	unknown		ancientforest.org/wp-content/uploads/Appendix-2-Table-of-Hemlock-Sites.pdf
Lost Dog Lake Central Old-growth Hemlock Forest	Ontario	79	partial	dominant species	minor historical logging		www.ancientforest.org
Echo Lake Ancient Forest	Quebec	56	YES	dominant species	unknown		Labelle (2019)
Panuke Lake Nature Reserve	Nova Scotia	47	YES	partial	unknown		https://novascotia.ca/nse/
Gagnon Lake Eastern Hemlock Old-growth Forest	Quebec	45	unknown	dominant species	unknown		Villeneuve and Brisson (2003)
Devlin Lake Eastern Hemlock Old-growth Forest	Quebec	31	unknown	dominant species	unknown		Villeneuve and Brisson (2003)
Sisco Lake Old-growth Hemlock Forest	Ontario	29	partial	dominant species	minor historical logging		www.ancientforest.org
Sporting Lake Nature Reserve	Nova Scotia	25	YES	partial	unknown		https://novascotia.ca/nse/
Gillies Grove	Ontario	25	YES	dominant species	unknown		ancientforest.org/wp-content/uploads/Appendix-2-Table-of-Hemlock-Sites.pdf
Preston Lake Eastern Hemlock Old-growth Forest	Quebec	20	unknown	dominant species	unknown		Villeneuve and Brisson (2003)
Balls Falls Gorge (Twenty Valley)	Ontario	20	YES	dominant species	minor historical logging		ancientforest.org/wp-content/uploads/Appendix-2-Table-of-Hemlock-Sites.pdf
Mckeel Woods Eastern Hemlock Old-growth Forest	Quebec	17	unknown	dominant species	unknown		Villeneuve and Brisson (2003)
Decew Falls and Gorge	Ontario	11	YES	dominant species	minor historical logging		ancientforest.org/wp-content/uploads/Appendix-2-Table-of-Hemlock-Sites.pdf
Durland Lake Old-growth Forest	Nova Scotia	10	YES	dominant species	unknown		http://oldforests.ca/special.html
Jackson Creek Old-growth Forest	Ontario	5	YES	dominant species	minor historical logging		www.peterborougholdgrowth.ca
Hemlock Valley	Ontario	5	YES	dominant species	unknown		ancientforest.org/wp-content/uploads/Appendix-2-Table-of-Hemlock-Sites.pdf
Basswood Lake Hemlock Conservation Reserve	Ontario	unknown	YES	partial	unknown	provincially significant	ontario.ca/page/crown-land-use-policy-atlas
Bolton Resource Management Tract (Humber Valley)	Ontario	unknown	YES	partial	historical logging		ancientforest.org/wp-content/uploads/Appendix-2-Table-of-Hemlock-Sites.pdf
Commanda Creek Conservation Reserve	Ontario	unknown	YES	partial	minor historical logging		ontario.ca/page/crown-land-use-policy-atlas
Crane Lake Forest Conservation Reserve	Ontario	unknown	YES	partial	minor historical logging		ontario.ca/page/crown-land-use-policy-atlas
Dundas Valley	Ontario	unknown	YES	partial	minor historical logging		ancientforest.org/wp-content/uploads/Appendix-2-Table-of-Hemlock-Sites.pdf
Eastern Cardwell Forest Conservation Reserve	Ontario	unknown	YES	partial	historical logging		ontario.ca/page/crown-land-use-policy-atlas
Glenn N. Crombie Conservation Reserve	Ontario	unknown	YES	partial	historical logging	"has the largest concentration of hemlock... at the northern extent of its range in Ontario"	ontario.ca/page/crown-land-use-policy-atlas
Lower Moon River Conservation Reserve	Ontario	unknown	YES	partial	historical logging		ontario.ca/page/crown-land-use-policy-atlas
Marcy's Woods (Point Albino)	Ontario	unknown	YES	partial	unknown		ancientforest.org/wp-content/uploads/Appendix-2-Table-of-Hemlock-Sites.pdf
Mark S. Burnham Provincial Park	Ontario	unknown	YES	partial	minor historical logging		ancientforest.org/wp-content/uploads/Appendix-2-Table-of-Hemlock-Sites.pdf
Monteith Forest Conservation Reserve	Ontario	unknown	YES	partial	minor historical logging		ontario.ca/page/crown-land-use-policy-atlas
Moon River Conservation Reserve	Ontario	unknown	YES	partial	historical logging		ontario.ca/page/crown-land-use-policy-atlas
Mowat Township Hemlock Forest Conservation Reserve	Ontario	unknown	YES	partial	historical logging		ontario.ca/page/crown-land-use-policy-atlas
Niagara Gorge First Growth Steep Slope Forest	Ontario	unknown	YES	partial	pristine		ancientforest.org/wp-content/uploads/Appendix-2-Table-of-Hemlock-Sites.pdf
Peter's Woods Provincial Park	Ontario	unknown	YES	partial	minor historical logging		ancientforest.org/wp-content/uploads/Appendix-2-Table-of-Hemlock-Sites.pdf
Rouge National Urban Park	Ontario	unknown	YES	partial	minor historical logging		ancientforest.org/wp-content/uploads/Appendix-2-Table-of-Hemlock-Sites.pdf
Ryerson Township Forest Conservation Reserve	Ontario	unknown	YES	partial	historical logging		ontario.ca/page/crown-land-use-policy-atlas
Seneca College King Campus	Ontario	unknown	YES	partial	unknown		ancientforest.org/wp-content/uploads/Appendix-2-Table-of-Hemlock-Sites.pdf
Silver Creek Valley	Ontario	unknown	YES	partial	unknown		ancientforest.org/wp-content/uploads/Appendix-2-Table-of-Hemlock-Sites.pdf
Stewart's Woods	Ontario	unknown	YES	partial	minor historical logging		ancientforest.org/wp-content/uploads/Appendix-2-Table-of-Hemlock-Sites.pdf
Swan Lake Conservation Reserve	Ontario	unknown	YES	partial	historical logging		ontario.ca/page/crown-land-use-policy-atlas
Terra Cotta Woods	Ontario	unknown	YES	partial	unknown	provincially significant	ancientforest.org/wp-content/uploads/Appendix-2-Table-of-Hemlock-Sites.pdf
French River Wilderness Area (Cape Breton Boreal Plateau)	Nova Scotia	unknown	YES	partial	unknown		https://novascotia.ca/nse/
Grand Lake Hemlock Forest	Nova Scotia	unknown	NO	partial	unknown		https://www.merseytobeatric.ca/
Great Barren & Quinan Lakes Nature Reserve	Nova Scotia	unknown	YES	partial	unknown		https://novascotia.ca/nse/
Kejimikujik National Park	Nova Scotia	unknown	YES	partial	unknown		https://novascotia.ca/nse/
Little Bear Lake Old-growth Forest	Nova Scotia	unknown	NO	partial	unknown		https://www.merseytobeatric.ca/
North River Wilderness Area	Nova Scotia	unknown	YES	partial	unknown		https://novascotia.ca/nse/
Porcupine Lakes Old-growth Forest	Nova Scotia	unknown	NO	partial	unknown		https://www.merseytobeatric.ca/
Portapique River Wilderness Area	Nova Scotia	unknown	YES	partial	unknown		https://novascotia.ca/nse/
Shelburne River Wilderness Area	Nova Scotia	unknown	YES	partial	unknown		https://novascotia.ca/nse/
Tobeatric Wilderness Area	Nova Scotia	unknown	YES	partial	unknown		https://novascotia.ca/nse/
Toney Lake Old-growth Forest	Nova Scotia	unknown	NO	partial	unknown		https://www.merseytobeatric.ca/
Waverley-Salmon River Long Lake Wilderness Area	Nova Scotia	unknown	YES	partial	unknown		https://novascotia.ca/nse/

References: (1) Labelle, T. 2019. *Personal Communication*. Canadian Parks & Wilderness Society - Ottawa Valley Chapter, Gatineau, QC. (2) LIO (Land Information Ontario). *Forest Resource Inventory Data*, accessed June 2019. (3) Quinby, F. 2019. *Old-growth Hemlock Stands in Algonquin Park, ON*. Ancient Forest Exploration & Research, Powassan, Ontario. (4) Villeneuve, N. and J. Brisson. 2003. Old-growth forests in the temperate deciduous zone of Quebec: Identification and evaluation for conservation and research purposes. *The Forestry Chronicle* 79:559-569.

Appendix C

Conservation Status of Temperate Forest Types in Central Ontario (on the Canadian Shield) (>60% dominance in the overstory; all ages; based on FRI data)

Forest Type	2001		2006		2011		10-yr Change	Conservation Status
	Ha	%	Ha	%	Ha	%		
American Basswood	263	0.02	177	0.02	177	0.01	declined (33%)	Critically Endangered
American Beech	2,261	0.2	388	0.2	404	0.03	declined (82%)	
Yellow Birch	4,913	0.3	5,670	0.4	5,366	0.4	increased (9%)	
Eastern Hemlock	20,236	1.4	18,140	1.5	18,618	1.5	declined (8%)	Endangered
Red Maple	165,213	11.6	21,043	12.5	20,930	1.6	declined (87%)	
Ash (Black & White)	24,575	1.7	29,792	1.9	27,580	2.2	increased (12%)	Threatened
Oak (all; primarily Red)	52,671	3.7	37,271	4.0	38,902	3.0	declined (26%)	
Red Pine	59,193	4.2	67,195	4.5	73,025	5.7	increased (36%)	Special Concern
Balsam Fir	102,838	7.2	127,316	7.8	100,940	7.9		Common
White Spruce	99,007	7.0	115,953	7.5	108,785	8.5		
Eastern White Pine	110,607	7.8	121,607	8.4	130,916	10.2		
Northern White Cedar	237,805	16.8	253,444	18.0	237,691	18.6		
Sugar Maple	539,900	38.0	521,883	40.9	515,099	40.3		
Total	1,419,482		1,319,879		1,278,433			

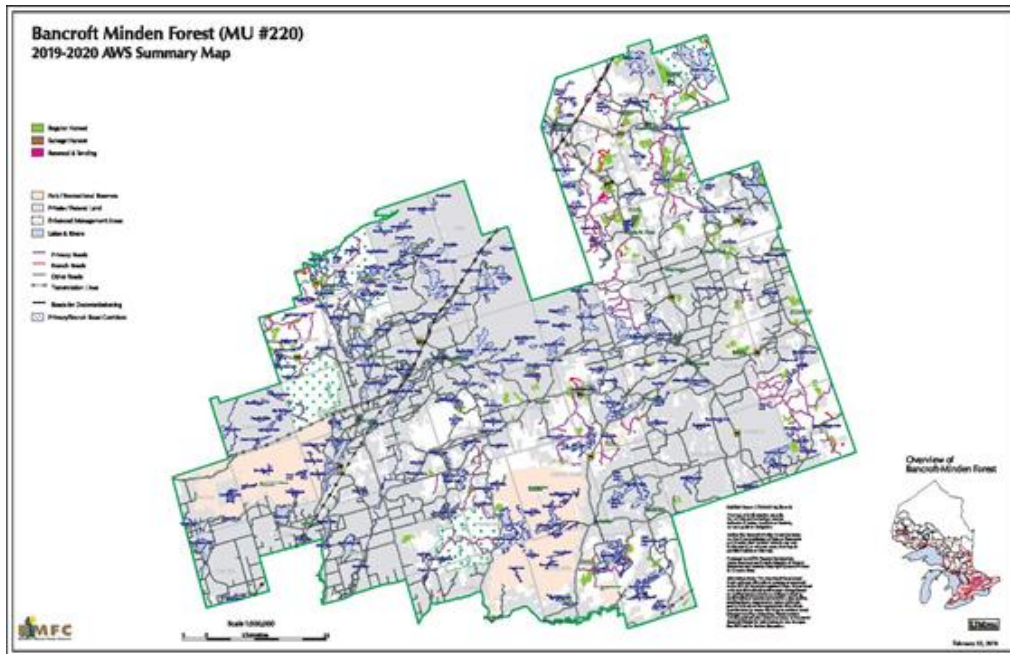
NOTES: from Watkins, Larry. 2011. *The Forest Resources of Ontario 2011*. Ontario Ministry of Natural Resources, Forest Evaluation and Standards Section, Forests Branch. Sault Ste. Marie, Ontario. 307 pp.

Appendix D

Species-at-Risk Observed or Potential at the Catchacoma Old-growth Forest

Species	SARO (Ontario) Status	SARA (Federal) Status	Observed or Potential	Dependent on OGF?	Notes	References
Mammals						
Algonquin Wolf	THR	SC	potential	Possibly		
Northern Myotis	END	END	potential	Possibly		
Tri-Coloured Bat	END	END	potential	Possibly		
Birds						
Bald Eagle	SC	N/A	observed nearby	Likely	iNaturalist; north Kawartha Highlands Provincial Park	D.M. Wills report
Canada Warbler	SC	THR	potential	Yes	See D.M. Wills reference to OGF (no citation)	D.M. Wills report
Cerulean Warbler	THR	END	potential	Likely	See D.M. Wills reference to mature forests (no citation)	D.M. Wills report
Common Nighthawk	SC	THR	potential	Unlikely		D.M. Wills report
Eastern Whip-poor-will	THR	THR	potential	Possibly	D.M. Wills mention an association with mid-succession forests	D.M. Wills report
Eastern Wood-pewee	SC	SC	observed	Likely	NHIC database	NHIC map search
Golden Eagle	END	N/A	potential	Possibly		
Least Bittern	THR	THR	potential	Unlikely		D.M. Wills report
Louisiana Waterthrush	THR	SC	potential	Likely	See D.M. Wills reference to mature forests/older growth woodland (no citation).	D.M. Wills report
Red-Headed Woodpecker	SC	THR	potential	Possibly	"The open areas where this species breeds tend to contain a high density of dead trees that can be used for nesting and perching."	D.M. Wills report
Wood Thrush	SC	THR	potential	Likely		
Reptiles						
Blanding's Turtle	THR	THR	potential	Possibly	"Terrestrial habitat is generally upland wooded areas, consisting of mixed deciduous or coniferous forest."	D.M. Wills report
Common Five-Lined Skink (Great Lakes/St. Lawrence population)	SC	SC	observed	Possibly	iNaturalist observations (~6 in and near the OGF)	D.M. Wills report
Eastern Milksnake	N/A	SC	potential	Possibly	"However in Ontario they prefer heavy forested habitats of deciduous, evergreen or mixed or houses and hay fields (Environment Canada 2002)" -Trent paper 2010	D.M. Wills report, trent paper
Eastern Musk Turtle	SC	SC	potential	Unlikely		D.M. Wills report
Eastern Ribbonsnake (Great Lakes population)	SC	SC	potential	Possibly	"Sometimes found in vernal pools and moist woods."	D.M. Wills report
Northern Map Turtle	SC	SC	potential	Unlikely		D.M. Wills report
Snapping Turtle	SC	SC	potential	Unlikely	iNaturalist; within a few km at north Catchacoma Lake	D.M. Wills report
Wood Turtle	END	THR	potential	Possibly		Trent paper
Insects						
Monarch Butterfly	SC	SC	observed nearby	Unlikely	iNaturalist; north Catchacoma Lake	D.M. Wills report
Plants						
American Ginseng	END	END	potential	Likely (https://www.ontario.ca/page/american-ginseng)		
Broad Beech Fern	SC	SC	potential	Unknown		
Spotted Wintergreen	THR	END	potential	Unknown		
White Wood Aster	THR	THR	potential	Unknown		
Lichen						
Pale-bellied Frost Lichen	END	END	potential	Possibly	Two known sites restricted to Ironwood (Hop-hornbeam).	D.M. Wills report

Appendix E



Appendix F

