

Ashby Lake Protective Association (ALPA) *et. al.*

January 29, 2021

Re: Review of Long-Term Management Direction, Mazinaw-Lanark Forest 2021-2031 Forest Management Plan

Dear Mr. Annan,

Thank you for your feedback on the Long-Term Management Direction for the Mazinaw-Lanark Forest (MLF) 2021-2031 Forest Management Plan (FMP) on behalf of ALPA and 6 other lake associations on December 4th.

In Ontario, the Ministry of Natural Resources and Forestry (MNRF) is responsible for the long-term health of Crown forests (public land). Through forest management planning, forest managers provide for healthy forests now and in the future and provide a range of sustainable benefits (e.g. timber and commercial products, wildlife habitat and recreational opportunities). Ontario is a world leader in sustainable forest management. Our robust regulatory framework ensures the long-term health of our forests while supporting economic opportunity for Ontarians. We know that for Ontario's forest industry to remain strong and vibrant in the long term, we need to ensure that our Crown forests are healthy, diverse, and productive.

Before responding to your specific requests, the planning team would like to address your points made about the public consultation process and Forest Management Planning in general. The frequency and extent of public consultation for Forest Management Planning in Ontario is mandated by the Crown Forest Sustainability Act (1994) and laid out in the Forest Management Planning Manual (FMPM 2020). There are multiple opportunities for consultation throughout the approximately three-year planning period prior to plan implementation. Below you'll find information outlining the multiple stages of public consultation in Forest Management Planning in Ontario, including dates specific to MLF:

Stage One- Invitation to Participate (October 2018)

Stage Two- Review of Long-Term Management Direction (July 28th-August 27th, 2020)

Stage Three- Review of Proposed Operations (November 11-December 10th, 2020)

Stage Four – Review of Draft Forest Management Plan (60-day review period tentatively scheduled for March-May 2021)

Stage Five – Revision and Approval of the FMP (tentative July 2021)

Notices are used to advise the public of the stage of consultation approaching and to provide information to be used in the FMP process. Direct written notices are issued at each stage of public consultation to interested and affected persons or organizations on MNRF's mailing list. We also publish public notices in local newspapers and recently started providing notifications on social media to ensure we are reaching as many affected individuals as possible. We are more

than happy to add anyone to our mailing list; please reach out to any of the contacts listed below if a member would like to be added to our notification list for future notifications.

The remainder of this letter responds directly to your requested conditions to be included in planning and operations activities for the 2021-2031 Mazinaw-Lanark Forest FMP:

- 1. No logging or forestry activity should be conducted within 150m from all lake shores, rivers and streams, and nearby wetlands and**
- 2. No logging or forestry activity should be conducted within 300m from designated lake trout lakes**

With respect to forestry activities near water values, the Forest Management Guide for Conserving Biodiversity at the Stand and Site Scales (SSG) provides direction for the protection of both large scale and site-specific habitat. This includes maintaining the ecological functions of water and wetland ecosystems and shoreline forest including habitat suitability and productive capacity. The SSG was based on a thorough review of scientific literature, advice and expert opinion of researchers and resource managers. The SSG is part of a series of forest management guides that direct sustainable forest management practices and are used in the preparation of the ten-year forest management plans (i.e. 2021-2031 FMP). Sections of interest include: Section 4.0 Conserving Biodiversity – Management of Site-specific Habitat, and Section 4.1 Maintaining Ecological Function of Aquatic and Wetland Ecosystems and Shoreline Forest Including Habitat Suitability and Productive Capacity.

Section 4.1 provides direction for standing waters (i.e. lakes and ponds), flowing waters (i.e. rivers and streams), wetlands and protection of special habitat features, including species at risk., as a conservative approach to mitigate the impacts of forest management activities – direction has been incorporated in the 2021-2031 Forest Management Plan as per FMP Table 11 (see attached).

Please visit the following link for a PDF copy of the SSG:

<https://www.ontario.ca/document/forest-management-conserving-biodiversity-stand-and-site-scales>

The PT has also incorporated the following additional direction outside of the SSG guidelines:

- Shoreline Use Area (SUA). This AOC was revised during the development of the current plan (2011-2021) through formal consultation stages from concerned members of local cottage associations and was carried forward to the current FMP (2021-2031).
 - Remote Lake Access Zones
 - Remote Lakes and Streams Containing Self-sustaining Trout Populations
- 3. To preserve the current viewscape, there should be no forestry activity within the highest ridge lines visible from the lakes, if beyond the setbacks referenced above**

It is understood that integrity of the viewscape around lakes is a major concern to you and the associations you represent and that harvesting activities can result in alterations to the visible tree line. Upon request, a viewshed analysis can be completed on the planned allocations in areas of concern to lake users, however, this analysis would be for the purpose of evaluating the impact harvesting has on the viewscape and determine the visibility of planned operations from the lake. It should be acknowledged that the viewshed analysis is coarse-level planning tool whose results may require site specific refinement.

The results of these analyses would require further discussions on the best approach to minimizing the overall impact to the viewscape and adapting management decisions to balance objectives while minimizing any effects on the visible tree line. These management decisions may include, but are not limited to, the type of harvest method, additional block planning such as reserves or modified management zones at the FMP planning and/or Forest Operations Prescriptions stage or bypassing due to other operational considerations and constraints.

4. There should be no alteration to, or use of, primary access roads and recreational trails, or visible activity of forestry operations from the roads or trails near the lakes below

Most forest roads on Crown land have been constructed over several decades by the forest industry or MNRF for the purposes of forest management. Through time, many of the roads left in place have provided a means of access for recreation, tourism, mining, fire suppression, private land, and various other users. Many users have become reliant on the infrastructure for both access and enjoyment of Crown land and there is no direction to restrict access on these roads to one user group (i.e. forest industry) while allowing access to others. Roads on Crown land will continue to provide access to all user groups.

Detailed direction for Crown roads selected for forest management activities was provided at Stage 3 of Public Consultation, including a table) summarizing roads to be used during the 10-year forest management period, in addition to road use management strategies with provisions on responsibility, monitoring, maintenance, etc. A copy of this table is available upon request.

Annual Work Schedules (AWS) are provided on an annual basis for public viewing to indicate scheduled forest management activities and their locations for the upcoming year (April 1st to March 31st of the following year). The interested party could also follow up with forest industry for the time of year specific forest management activities are anticipated to take place in a given area.

It's important to note that building recreational trails on Crown land requires authorization from the Ministry under a Land Use Permit. Authorized trails, including known historical trails, will continue to be protected as per direction provided in the FMP. Additional direction for historical Aboriginal trails will be discussed with the appropriate First Nation community(ies).

Currently, trails designated and maintained by MNR and trails maintained by recognized organizations require conditions to be followed during operations. These conditions include keeping safety in mind by installing signs and keeping trails free of debris, and returning the trail to its original condition upon completion of operations. If you would like a copy of the Conditions on Regular Operations document that was available at Stage 3, please let us know.

Unauthorized trails that do not fall within the above designations, are to be discussed with forest industry prior to operational planning development. The appropriate timing would be at the start of the AWS (i.e. April 1st of any given year).

5. There should be no forestry activity within hearing range between May 1st and November 1st from the lakes listed below

We recognize that there are multiple users within the forest and that areas scheduled for harvest may conflict with other user groups. In acknowledgement of the multiple use areas on the management unit, the timing of various operations can be restricted, depending on the specific circumstance. The proposed areas that may be included, the types of operations that may be restricted as well as the length of the restriction is determined on a case by case basis. With that said, the above request for timing restrictions must be discussed with individual associations due to site-specific geography, recreational, logistical and operational planning, that cannot be addressed through a proposed broad timing restriction request. We encourage individual associations with timing concerns to reach out to the PT directly. Site specific discussions with planning team representatives is likely required.

6. No logging or forestry activity should be conducted within 500m from private property.

At present, there are no restrictions on forestry activities on Crown land near patent (private) property on Mazinaw-Lanark Forest. Forestry is permitted on Crown land through the Crown Forest Sustainability Act and approved through the Forest Management Planning Process. The southern region of Ontario is unique in that Crown land often sits adjacent to patent land, provincial parks or reserves. With the intention of maintaining good relationships with all stakeholders, it is common practice for private landowners to be contacted by Mazinaw-Lanark Forest Inc. prior to operations to ensure harvesting does not encroach on private land. This communication practice is intended to continue in the upcoming 2021 plan.

In response to requesting that the above protections become non-negotiable, permanent changes to future long-term, short-term and annual forestry management and operation plans

Forest Management Planning is intended to be iterative, stressing the importance of using new information and data to inform future decisions. Each planning cycle uses valuable

recommendations from stakeholders, changes in forest conditions, changes in science and policy and efforts to meet management objectives to ensure the sustainability of each new FMP.

Many areas in the vicinity of lakes represented by the multiple lake associations listed in your original letter are eligible for harvest. Areas of productive Crown forest will not be removed from consideration in the upcoming FMP or future FMPs without specific rationale to do so.

Thank you again for taking the time to present your concerns to the PT. Please be reminded that forest management planning is a collaborative process that ensures feedback from the public, municipalities, First Nation and Métis Communities, and forest stakeholders are heard and incorporated. As noted above, further opportunities for public consultation will be available at Stage Four: Review of Draft Forest Management Plan tentatively planned for the end of March 2021. Information will be available to comment electronically on the Ontario government website: <https://nrip.mnr.gov.on.ca/s/fmp-online> .

As you are likely aware, several of the lake associations listed in your letter have already been corresponding with MLF Planning Team members. To facilitate communication and given the unique circumstances and requests of some groups , please advise if the seven lake associations listed in your letter would like to proceed with communications as one group or if they would like to continue corresponding separately.

If you require any additional information, please do not hesitate to contact either Joel Martineau (joel.martineau@ontario.ca) or Margaret Hatton (mhatton@mlfi.org).

Best Regards,

The 2021-2031 Mazinaw-Lanark Forest Management Planning Team