



Dec 9, 2020

Joel Martineau, and the 2021-2031 Mazinaw-Lanark Forest Management Planning Team
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Dear Joel Martineau and the 2021-2031 Mazinaw-Lanark Forest Management Planning Team,

Thank you for your letter of Nov. 6, 2020.

For items 1 and 2 of your letter we respectfully submit that the intent and purpose of the SSG is to be precautionary in protecting large highly sensitive ecology like the Weslemkoon Watershed. As you will see in this document the changes the LWCA are requiring of the FMP are in total alignment of the SSG, and must be instituted in the FMP to protect Lake Weslemkoon. If not, the MLFI, and the MNR will be in contravention of the SSG and as a result in contravention of the CFSA.

For item 3, please accept our request for the MNR to undergo a viewshed analysis of the harvest blocks requiring change in this document, and that this analysis, on site, and otherwise, be completed in collaboration with the LWCA. Further, any results of this analysis in terms of protection of the Lake Weslemkoon water shed must be additive to those protections that are outlined in this document as they refer to items 1 and 2 above. In addition, please note that reserves (setbacks) with no forestry activity, or a complete bypass of all forestry activity for the harvest blocks in this document are required as a minimum to protect the unique ecology and viewing value of the Lake Weslemkoon watershed.

For item 4, please note the LWCA has managed 12 trails on Lake Weslemkoon and Otter Lake since before 1963, and that most of these trails have been used by first nations people for hundreds of years before this. It is of paramount importance that these trails be protected for all recreational activities with minimum setbacks of 300 meters on both sides of the trail from all forestry activities. If these trails do not already exist on a MNR registry, please do add them, and send the LWCA a copy of said registry or like facsimile. Attached is a lake map with these trails noted and below is a list of these trails.

Dutchmans and Buck Lake Trail

High Dam Trail

Ashby Lake Trail

Mackenzie Lake Trail (a.k.a. Arnott Lake)

Mink Lake Trail (a.k.a. Heath Lake)

Shiner Lake Trail

Little Weslemkoon Lake Trail (a.k.a. Effingham Lake)

Little Long Lake Trail

Canoe Lake Trail

Buck Lake Trail



Green Lake Trail (a.k.a. Slipper Lake) north arm and south arm

For item 5, the reasonable timing restriction for forestry operations in the Lake Weslemkoon water shed, for the 2011 to 2021 FMP and the 2021 to 2031 FMP is from April 1 to November 30. This is due to climate change expanding the use of the Lake Weslemkoon water shed by seasonal residents, and all recreational users. Remote back country and cottager use of the Lake Weslemkoon watershed has expanded into this new climate change time frame. Winter camping and cottage use has also expanded dramatically.

For item 6, we respectfully submit that a 500 meter set back from all private property on Lake Weslemkoon and Otter Lake must be included in the FMP for the Lake Weslemkoon Conservation Association speaks for all private land owners that are LWCA members, over 250 members, and that they have made it abundantly clear that this setback is a minimum requirement, and as Ontario provincial tax paying property owners this must be included in the FMP.

For item 7, this FMP process is a collaborative process, and that is the expectation of the LWCA. However, we respectfully submit that we see no movement or change i.e. collaboration, from the planning team in terms of the preferred harvest blocks in the Weslemkoon Water shed. If the planning team is truly collaborating, and not just using SSG prescriptions to harvest marketable timber with no collaborative input, then it will inform the LWCA of the steps it is taking to include the necessary changes the LWCA is requiring in this document. Further, we respectfully submit, that not making these changes, the planning team will be in contravention with the SSG and as a result in contravention of the CFSA.

Please allow us to preface our further comments beyond the items in the planning team's letter of Nov., 6 by saying, there are serious issues with the proposed harvest blocks to the south and east sides of Lake Weslemkoon. We respectfully submit that the planning team make changes to these harvest blocks that we outline in this letter. This will allow for further alignment to the Forest Management Guide for Conserving Biodiversity at the Stand and Site Scales (SSG), the provincial Crown Forest Sustainability Act (CFSA), and the Federal Fisheries Act. These documents make it clear that the changes we are requesting of the 2021-2031 FMP must be implemented, or, again, the planning team will be in contravention to the SSG, the CFSA and the Federal Fisheries Act.

We wish for the planning team to also note that the LWCA is a non-profit volunteer association with limited resources and that the planning teams' expedient addition of the changes to said harvest blocks in this letter be implemented without delay to avoid further time expensed on this issue by the LWCA.

Further the LWCA reserves the right to add to these required changes in this document and is not limited to the number or type of changes it requires the planning team to collaboratively make in the FMP.

Lastly the LWCA respectfully requests a meeting with a smaller group of 3 or 4 people from the planning team that represent the executive decision makers of the team, to further discuss the imperative of making the changes in this document to the FMP.



This letter has two sections:

1. Harvest Block Issues and Required Changes
2. Evidence from the SSG, the CFSA, and the Fisheries Act that Require these Changes

We look forward to your acknowledgement of this very important correspondence and the planning team's incorporation of these changes into the Mazinaw Lanark Forest Management Plan for 2021 – 2031, and your notification of a meeting time with the executive of the planning team.

Kind regards,
Bruce Magee
Director of Forestry and Trails, LWCA

Section 1. Harvest Block Issues and Required Changes

Map 21-149 South end of Lake Weslemkoon

Block's 21-149 and 21-150

Both of these blocks have serious encroachment issues on Lake Weslemkoon, shoreline, bogs, wetlands, streams, and private property. The following changes need to be made to the AOC's in this harvest block.

AOC-SUA - At present both blocks have a 0-50m band of reserve with no harvest, or tending operations being permitted, and a 50-100m band of residual forest with a min BA of 9m²/ha >10cm DBH to be maintained. This is woefully inadequate. The complete AOC-SUA in these blocks must be in 100% reserve to protect the spawning grounds of both the highly sensitive population of Jewel Lake Trout and the angler's sought-after large mouth bass from sediment and nutrient load runoff. These shores also have significant view-scape value for both cottagers and recreational users and must be protected. Anything less than this band being in 100% reserve will directly contravene the SSG and is thus not acceptable.

AOC-REM3 - At present in both blocks this AOC is allowing for regular harvest, renewal and tending operations in a 300-meter band behind the AOC-SUA. This section needs to be in reserve, and marked yellow with no forestry activity, for this area directly impacts the highly sensitive lake trout spawning beds of Lake Weslemkoon and the view-scape value. Anything less than this will directly contravene the SSG and is thus not acceptable.

AOC-HPW and MPW - At present in both blocks the width of this AOC is to be determined by the slope. All of these AOC-HPW and MPW areas have significant slope that will impact sediment and nutrient discharging/loading into the watershed that will directly impact the highly sensitive bogs and wetlands at this end of Lake Weslemkoon, and the highly sensitive lake trout and their spawning beds of Lake Weslemkoon. For these reasons, the HPW and MPW must have a 300-meter reserved band in yellow with no forestry activity. Anything less than this will directly contravene the SSG and is thus not acceptable.



Further to the above AOC's the LWCA would like to request a viewshed analysis from the MNR so that together we can evaluate the impact of harvesting, and determine the visibility of planned operations from the lake to ensure that appropriate reserves and or complete bypassing is incorporated into the FMP.

Further to the above AOC's, LWCA asks that the condition on regular operations (CRO) for the enhanced management area E5a around Lake Weslemkoon, which includes all the mentioned harvest blocks in this document to be curtailed to the winter months of December to March to avoid noise pollution to the users of the enhanced management area. Climate change and COVID has broadened the use time of the E5a and seasonal properties from April to November.

Operational Road Boundary – In these blocks the Operational Road Boundary is marked along the shore of both private year-round residential and seasonal property owners and the most highly sensitive bog and highly sensitive lake trout spawning shoreline on the lake. From both a conservation and view-scape perspective this is totally unacceptable. This kind of encroachment of operational road boundary must be retreated into the harvest block area with one access point on the west, east, or south side of the harvest block.

[Map 21-172](#)

[Block 21-174](#)

This block has serious encroachment issues on Heath Lake (a.k.a. Mink Lake), Heath Creek, and the surrounding bogs and wetlands, of this stream that connect Heath Lake to Shiner Lake and on into Lake Weslemkoon. The following changes need to be made to the AOC's in this harvest block.

AOC-REM3 In this block the present AOC is allowing for regular harvest, renewal and tending operations in the 300-meter band around Heath Lake. This needs to be in reserve and marked yellow with no forestry activity. This area directly impacts the highly sensitive lake trout spawning beds of Lake Weslemkoon for Heath Lake is the spring fresh headwater for Lake Weslemkoon, and Heath Lake has a unique population of white bellied small mouth bass population, that must be preserved.

In addition, this area is marked by the MNR for enhanced management, E5a, due to the unique Jewel Lake Trout in Lake Weslemkoon and more specifically to Heath Lake, Shiner Lake, and the watercourse that connects them to Lake Weslemkoon, and the surrounding area of this watercourse. This area must be maintained as a remote access area with characteristics that enable the continuance of backcountry recreation. Typically, this means large areas of high-quality backcountry which provide the public with quality remote recreational experiences including hunting, fishing, canoeing, and camping. There is a high ridge that surrounds Heath Lake which must not have any forestry activity and must be placed 100% in yellow reserve as well as 300 meters on both sides of Heath Creek, around Shiner Lake and its creek into Lake Weslemkoon. Placing this large area in reserve is key to protecting its remoteness, which is so valued by the many visitors to Heath Lake annually. This also protects the wilderness values outside the parks and protected areas system, which is the intent of this E5a area.



AOC-HPW and MPW - At present, in both blocks, the width of this AOC is to be determined by the slope. All of the AOC-HPW and MPW areas have significant slope that will impact sediment and nutrient discharging/loading into Heath Lake and the watershed of Lake Weslemkoon, Heath Creek, Shiner Lake, and Shiner creek. This will directly impact the unique population of highly sensitive Jewel Lake Trout of Lake Weslemkoon, and the remote population of white bellied small mouth bass in Heath Lake. For these reasons the HPW and MPW must be a 300-meter reserved band in yellow with no forestry activity. Anything less than this will directly contravene the SSG and is thus not acceptable.

Further to the above AOC's the LWCA would like to request a watershed analysis from the MNR so that together we can evaluate the impact of harvesting, and determine the visibility of planned operations from the lake to ensure that appropriate reserves and or complete bypassing is incorporated into the FMP.

Further to the above AOC's LWCA asks that the condition on regular operations (CRO) for the enhanced management area E5a around Lake Weslemkoon, which includes all the mentioned harvest blocks in this document to be curtailed to the winter months of December to March to avoid noise pollution to the users of the enhanced management area. Climate change and COVID has broadened the use time of the E5a and seasonal properties from April to November.

Operational Road Boundary – In this block the Operational Road Boundary is marked through Heath Lake and through Heath Creek. For the reasons mentioned in the three AOC's above (REM3, HPW, and MPW) this kind of encroachment of operational road boundary must be retreated into the harvest block area with one access point from the east.

[Map 21-187](#)

[Block 21-188, and 78](#)

This block has serious encroachment issues on Arnott Lake (a.k.a. Mackenzie lake), Arnott Creek (a.k.a. Mackenzie Creek) and the hiking trail that Cottagers and remote lake campers, canoeists and anglers have used for decades to access this lake. Arnott and its creek is a direct headwater to Lake Weslemkoon. The following changes need to be made to the harvest areas and AOC's in this harvest block.

The purple regular harvest area between the yellow LUP hunt camp areas and up to the Arnott lake road, must be deleted and not harvested. The trail to access Arnott lake from Otter Lake goes right through the middle of this harvest area. This is an old growth Hemlock hike, especially as you get closer to Arnott Lake. This remote area must be preserved and thus the proposed harvest area must be deleted. This remote hike is one of the key reasons hikers are attracted to trip into Arnott Lake.

AOC-GBH, HPW, and MPW - At present this modified management zone around Arnott Lake and Creek is insufficient given the ecological importance of protecting the unique highly sensitive Jewel Lake Trout in Lake Weslemkoon. There is a significant drop in elevation from Arnott to Lake Weslemkoon, harvest around Arnott will have a direct impact on sediment and nutrient discharging/loading directly into Lake



Weslemkoon. This will directly impact the highly sensitive lake trout and their spawning beds. For these reasons, these AOC's must be changed to a 300-meter yellow reserved band with no forestry activity. Anything less than this is will not be precautionary in protecting Lake Weslemkoon Jewel Lake Trout and will directly contravene the SSG and is thus not acceptable.

Further to the above AOC's the LWCA would like to request a viewshed analysis from the MNR so that together we can evaluate the impact of harvesting, and determine the visibility of planned operations from the lake to ensure that appropriate reserves and or complete bypassing is incorporated into the FMP.

Further to the above AOC's LWCA asks that the condition on regular operations (CRO) for the enhanced management area E5a around Lake Weslemkoon, which includes all the mentioned harvest blocks in this document to be curtailed to the winter months of December to March to avoid noise pollution to the users of the enhanced management area. Climate change and COVID has broadened the use time of the E5a and seasonal properties from April to November.

Operational Road Boundary – The Operational Road Boundary is marked straight through Arnott Lake and Creek. This is not acceptable. For the reasons mentioned in the above AOC's for Arnott Lake and Creek the Operational Road Boundary must be backed into the regular harvest zone outline of block 78, which will still allow the use of the Arnott Lake Road from the north east of the harvest block.

Section 2. Evidence from the SSG, the CFSA, and the Fisheries Act that Require these Changes

The changes required in the above harvest blocks are evidenced with the following comments that are based on the Forest Management Guide for Conserving Biodiversity at the Stand and Site Scales (the SSG), the provincial Crown Forest Sustainability Act (the CFSA), and the federal Fisheries Act. These documents make it clear that the aforementioned changes to the above mentioned harvest blocks are required by the planning team and if these changes are not made in the 2021-2031 FMP, the planning team will be in contradiction to these guides and Acts.

Here is the evidence.

1. It is very clear that when it comes to protecting fish from sediment runoff it is the intent of the SSG to ensure that the planning team takes a precautionary approach to this protection. Lake Weslemkoon is home to a unique population of Lake Trout and the surrounding lakes of Heath, Arnott/Mackenzie and Shiner and have unique populations of small mouth bass. The planning team must take additional measures to protect these unique species by implementing the aforementioned reserves for said harvest blocks, or run the risk of contravening the SSG, the CFSA, and the federal Fisheries Act (1985). See page 36 of the SSG... ***Forest management operations can potentially change the composition or structure, and thus ultimately the function, of aquatic ecosystems, either through direct physical disturbance (e.g., installation of water-crossing structures) or by altering the linkage between terrestrial and aquatic***



ecosystems (e.g., altering the amount of, or pathways for, surface runoff)... At a watershed- or catchment-scale, forest management operations can influence the quantity and quality of water entering aquatic ecosystems... Catchment-scale effects are addressed in Section 3.2.2.3. At a finer scale, operations within or adjacent to aquatic and wetland ecosystems may potentially result in sediment entering aquatic features, damage to shorelines or stream banks, modification of the hydrological regime, changes to thermal regime, obstruction of fish passage, or alteration of inputs of coarse and fine organic material, with subsequent effects on fish and other species... The federal Fisheries Act (1985) prohibits any “work or undertaking that results in the harmful alteration, disruption or destruction of fish habitat” (Section 35(1)) and stipulates that “no person shall deposit or permit the deposit of a deleterious substance of any type in water frequented by fish” (Section 36(3))². Thus, while the following sections address a broad range of ecological functions, much of the focus is on mitigating potential effects of forest management operations in shoreline areas on water quality, fish, and fish habitat, especially those associated with input of sediment...

2. Further, it is clear in the SSG that the planning team must take a conservative approach, especially if the fish species in question is sensitive. Lake Trout are one of the most sensitive fish species, meaning they are highly sensitive to their habitat. Any change to their water temperature, dissolved oxygen level, or nutrient load will have a direct mortality impact on the population. Again, it is for this reason that the planning team must add the 100% reserve to the above-mentioned harvest blocks, for all these blocks feed into Lake Weslemkoon. Arnott lake feeds into lake Weslemkoon, and Heath lake feeds into Shiner lake and then into Lake Weslemkoon. See page 36 of the SSG... ***Thus, this guide adopts a conservative approach and provides protection to all flowing and standing waters, as well as the features that provide hydrological connections to terrestrial habitats... Under this approach, appropriate mitigation is a function of risk, where risk is defined by the scale of potential negative effects and the sensitivity of fish and fish habitats... Direction is more restrictive when operations have a higher potential for negative effects or when fish or fish habitats are likely to be more sensitive to potential effects.... When inventory data are available, the sensitivity of fish or fish habitat will be defined based on the resilience of species to perturbation, habitat dependency, species or habitat rarity, and habitat resiliency... When inventory data are not available, sensitivity will be based on characteristics of the aquatic feature that are assumed to reflect many of the criteria noted above, such as size, upstream catchment area, flow regime, and/or connection to other features known to support, or that potentially support, a fishery....*** Again, it is for this reason that the planning team must add a 100% reserve to the above-mentioned harvest blocks, for all these blocks feed into Lake Weslemkoon. Arnott lake feeds into lake Weslemkoon, and Heath lake feeds into Shiner lake and then into Lake Weslemkoon. These lakes and streams must be protected to conserve the highly sensitive and unique Jewel Lake Trout of Lake Weslemkoon. Inventory and breeding quality of this population has been recorded by the MNRF. The North Hastings Community Fish Hatchery harvests Lake Trout eggs to populate other lakes with this unique lake trout population. In addition, Heath Lake has a unique population of white bellied small mouth bass, for this is a deep spring fed lake completely land locked with no cottages. It is believed, that over the



- millennia, this population of small mouth bass have developed unique colouring. There is no inlet to this lake and only one outlet. So, it is logically believed that this population has self selected to develop an almost pure white belly. Very unique, and it must be preserved.
3. It is also critical that the planning team retain the visual aesthetics of the shoreline in the aforementioned blocks, for Lake Weslemkoon, Heath, Arnott and Shiner lakes are associated with key economic drivers of catch and release lake trout and bass angling, hiking and camping. See page 37... ***Moreover, large lakes and rivers are often associated with resource-based tourism. Planning teams may decide to retain unharvested forest along shorelines to maintain visual aesthetics...*** Further it is required that the planning team manage the shoreline of Lake Weslemkoon, Arnott Lake, Arnott Creek, Heath Lake, Heath Creek and Shiner Lake for they are all within the E5a management area of the MNR. The description of this management area, its land use intent, and management direction is clearly articulated on the Crown Land Use Policy Atlas and its supporting report, see the following link for the atlas, <http://www.gisapplication.lrc.gov.on.ca/CLUPA/Index.html?site=CLUPA&viewer=CLUPA&locale=en-US> and the following link for the report, <file:///C:/Users/Bruce%20Magee/Documents/LWCA/Forest%20Management%20Plan%202021%20to%202031/Enhanced%20Management%20Area%20of%20Lake%20Weslemkoon%20Ea5.html>. Here are the key excerpts of the report... ***DESCRIPTION: Weslemkoon Lake is a large lake with public access limited to the north and south ends. Most cottages are water access only. This area is also important to the forest industry and local recreationists, containing hunt camps and numerous recreational trails and tertiary class roads. This area contains lake(s) designated for lake trout management. For a current list of designated lakes associated with this area, refer to the Lake Trout Lake Search Index accessible via the 'Source of Direction' portion of this policy report. LAND USE INTENT: Maintain the remote access characteristics of this area, particularly the unaccessed shores of Weslemkoon Lake, while also managing this area for forest management, other resource uses and backcountry recreation. MANAGEMENT DIRECTION: Remote access enhanced management areas are intended to maintain the remote character of selected areas. Typically, these are relatively large areas which provide the public and tourism operators with high-quality remote recreational experiences including hunting, fishing, canoeing, and camping. Given the large size, remoteness, and relative absence of roads, these areas will play a significant role in protecting wilderness values outside the parks and protected areas system....*** It is for these reasons that the planning team must implement the further reserves defined in the aforementioned AOC's and harvest blocks.
 4. Further to the point about Lake Weslemkoon and the surrounding lakes being in an enhanced management area as designated by the MNR, the SSG clearly states that the planning team must restrict roads to maintain the ecological function of the aquatic system and thus protect the Lake Trout. See page 37 of the SSG... ***In other cases, increased access may not be consistent with management objectives if there is a potential for local over-harvest or introduction of invasive species. Lakes containing self-sustaining populations of brook trout or lake trout may be especially sensitive...*** The planning team must include the additional



- reserve protection in the aforementioned AOC's and harvest blocks or risk contravening the MNR land use policy.
5. It states directly in the SSG page 38 that... ***All lakes are considered to have high potential sensitivity to forest management operations... Deep oligotrophic lakes are especially important for cold water fish such as lake trout....*** Lake Weslemkoon is 180 feet deep, the deepest lake in the region, add to this the additional sensitivity of the lake trout in Lake Weslemkoon, AND that this is a unique population of lake Trout... it is therefore extremely important that the planning team include the changes articulated in the aforementioned AOC's, and harvest blocks, above. Or, run the risk of contradicting the SSG and as a result the CFSA.
 6. The stated purpose of the SSG which is the overarching conservation guide to the AOC's states clearly on page 1... ***In order to protect or enhance environmental, recreational, and cultural heritage values, the series of guides provides direction to assist forest managers to decide, for example, what areas of forest to harvest (and equally important, what areas not to harvest)...*** Thus, none of the AOC-SUA should be harvested for it is the shoreline of a very fragile bog and rocky bottom environment which is the spawning ground for the highly sensitive and unique Jewel Lake Trout population. In addition, these shores are used for recreation by cottagers for fishing, and hiking recreation.
 7. As stated in the SSG, the planning team has the latitude to make changes in their planning of harvest blocks. Note the following from page 3 of the SSG... ***These standards, guidelines and best management practices will be used by planning teams to assist them as they develop operational prescriptions specific for their management unit and circumstances.*** For this reason, the planning team must make changes to the aforementioned harvest blocks to create 100% reserved land with no forestry operations so that the Lake Weslemkoon highly sensitive Jewel Lake Trout and view scape are protected.
 8. The coarse and fine filters are insufficient to protect the view scape for cottagers and the highly sensitive Lake trout. Which according to the SSG these filters must achieve this protection. Note the following on page 3 of the SSG... ***1) the societal and/or economic aspects of sustainable development require more or less habitat than would be provided by nature, or 2) the ecological requirements of a particular species or value are not addressed or accommodated sufficiently.***
 9. It is stated clearly in the SSG that MNR staff must exercise caution in protecting natural values. Note page 5 of the SSG... ***As our understanding of the way the natural world works and how our actions affect it is often incomplete, MNR staff should exercise caution and special concern for natural values in the face of such uncertainty.*** For this reason there should be no forestry activity in the AOC's as mentioned above, for the natural values that must be protected are the highly sensitive Jewel Lake Trout, the sought after large mouth bass, and the viewscape for both cottagers, angler's, campers and canoeists.
 10. It is clearly stated that using the SSG is a legal requirement under MNR's class environmental assessment approval for forest management on Crown lands in Ontario. Thus, if the SSG is not fully incorporated into the FMP, both the licensed forestry corporation and the MNR will be in contradiction to the law. We recommend that the planning team heed the guide and pull back



the above mentioned modified management zones to 100% reserve zones with no forestry activity in order to protect the highly sensitive unique Jewel Lake Trout and the view scape of these AOC's. See page 6 of the SSG... ***Therefore, the FMPM requires that direction from this guide that is relevant to particular locations and operations is incorporated into the appropriate portions of the forest management plan.***

Using the forest management guides during the planning and implementation of forest management activities is also a legal requirement under MNR's class environmental assessment approval for forest management on Crown lands in Ontario as set out in Declaration Order MNR-71...

11. Since the SSG is a legally binding document it is critical that the planning team aligns to its vision by changing the proposed plan for the harvest blocks mentioned above to more align to the vision the MNR has for these operations. See page 9... ***The MNR envisions a healthy environment that is naturally diverse and supports a high quality of life for the people of Ontario through sustainable development. The MNR's mission is to manage Ontario's natural resources in an ecologically sustainable way to ensure that they are available for the enjoyment and use of future generations.***

Thus, more alignment to the SSG would mean placing the present modified AOC zones into reserve with no forestry activity.

12. The SSG also clearly states that FMP's must manage Ontario's natural resource on a sustainable basis. Highly sensitive Jewel Lake Trout and the surrounding view scape of Lake Weslemkoon are both highly important resources which must be managed i.e. protected when harvest blocks are being planned. Not aligning to this overarching purpose of the SSG would place the planning team in contradiction to the Crown Forest Sustainability Act (CFSA) of 1994. See page 9 and page 5 of the SSG... ***This document is intended to reflect the direction set out in the Statement of Environmental Values and to further the objectives of managing Ontario's natural resources on a sustainable basis.*** Thus, the planning team is bound to protect highly sensitive Lake trout lakes and viewsapes to the best of its ability. To do this the AOC's mentioned above must be in 100% reserve with no forestry activity.

13. It is very clear that the practitioner (i.e. the planning team) must pattern their assessment and thinking on all decision making from the Landscape Scale to the Site-Specific Scale in an integrated way. Thus, the Planning team must consider both landscape scale values that must be protected, i.e. the view-scape of Lake Weslemkoon and its unique Jewel Lake Trout, when making decisions at the site scale. Without this integrated decision-making approach the planning team will be in contravention of the SSG and thus in contravention of the CFSA. ***See page 12 of the SSG... While the direction in this guide has been integrated (e.g., scale of pattern assessment) into landscape scale direction, it is critical that the practitioner maintain this integrative thinking in all decision making. A lack of integrative thinking, particularly during operational implementation, could easily lead to decisions at one scale that limit or even preclude achievement at another scale.***

As conservation practitioners the LWCA sees that the planning team must include our changes to the aforementioned AOC's and harvest blocks, or be in contravention of the SSG and the CFSA.



Further, it is very clear that the planning team has the power to determine the detailed boundary and pattern of the harvest block, see page 14... ***Detailed harvest area planning (i.e., cutblock design) includes determining the shape of the outer boundary and delineating or describing any areas within the harvest boundary where modified harvest or no harvest will occur. Included in this process is the identification of AOCs, which may influence the amount and location of harvested, unharvested, or modified harvest areas. Implementation is the actual cutting of trees where local decisions about where to harvest (or not) can be made within the confines of the harvest boundary and the prescription for the site.*** HOWEVER, this must be in alignment with and integrated with the Landscape Scale values that must be protected i.e. the view-scape of Lake Weslemkoon and its unique Jewel Lake Trout, when making decisions at the Site Scale. Without this integrated decision-making approach, the planning team will be in contravention of the SSG and thus in contravention of the CFSA. Again, as conservation practitioners the LWCA sees that the planning team must include our changes to the AOC's and harvest blocks or be in contravention of the SSG and the CFSA.

14. Given that the SSC is 10 years old and the research that supported it at the time is now 15 to 20 years old, we respectfully submit that the catchment considerations for the aforementioned blocks are woefully inadequate to protect what we now know as a unique species value, the Jewel Lake Trout. See page 18 of the SSG... ***The removal of forest cover, by either a natural disturbance or as a result of forest management, has the potential to cause catchment scale hydrological effects such as changes in water yield and chemistry. The amount of cover removed, the pattern of removal, and the characteristics of the catchment can influence the magnitude of these effects and the subsequent response by the biological communities.*** Since the purpose and intent of the SSG is to be precautionary and error on the side of protection of the natural values the LWCA requires the planning team to change the harvest prescription as outlined in the aforementioned AOC's and harvest blocks above.
15. The wetland bog areas in the south end of Lake Weslemkoon directly along the shore of the proposed harvest blocks 21-149 and 21-150 are key to regulating water flow, cycling of nutrients, and absorption of toxic compounds from the wet lands and creeks in the proposed harvest areas. If these bogs get over-loaded with sediment and nutrients from the harvest block, this will have a direct impact on the highly sensitive unique Jewel Lake Trout in Lake Weslemkoon. It is critical that the planning team abide by the following clauses in the SSG on pages 55 and 57... Forest management operations within, or adjacent to, wetlands can affect the composition, structure, and/or function of wetlands, including their physical and chemical properties.... Harvest, renewal, and tending operations are not permitted within the PSW unless an Environmental Impact Study (EIS), and subsequent review and approval by MNR, demonstrates that the proposed operations will not result in the loss of natural features or ecological functions that make the wetland... Protecting the Lake Weslemkoon bogs is mission critical to protecting the highly sensitive unique Jewel Lake Trout. The planning team must incorporate the above-mentioned changes in the aforementioned harvest blocks to be precautionary and aligned to the SSG.
16. Hydrological impacts of forestry activities are of major concern to the natural values that the LWCA are trying to preserve, that being the highly sensitive unique Jewel Lake Trout, and the



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view-scape of the watershed. See page 157 of the SSG... ***Hydrological impacts can be described as changes in the potential rates and/or patterns of surface and shallow groundwater flow through various parts of the forest ecosystem...*** For this reason, it is critical that a 300-meter reserve band with no forestry activity be incorporated into the aforementioned harvest blocks.