

Ministry of Natural Resources and Forestry Ministère des Richesses naturelles et des Forêts
Northwest Region

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January 10, 2023

RE: Decision on your Issue Resolution request for Kellar, Dalton and Rocky Road areas for the 2023 to 2033 Forest Management Plan for the Wabadowgang Noopming Forest

Dear Mr. Fish, Mr. Elliot and Mr. Hyer,

Formal issue resolution related to the proposed Wabadowgang Noopming Forest (2023-2033) management plan (the “Draft FMP”) was requested by Vern Fish of friends of Wabakimi, Bruce Hyer from the Local Citizens’ committee and Don Elliot from Mattice Lake Outfitters. The requests overlapped the same or similar areas on the forest, so the issues were grouped into one meeting. In the issue resolution requests concerned three areas of interest commonly known as the Keller Road, the D’Alton Block, and the Rocky Road areas. The requesters felt that the Draft FMP must have seasonal access restrictions or completely defer harvest in these three areas until the next plan. An issue resolution meeting was held on December 6, 2022 to hear the various perspectives on how to manage these areas. A list of participants in that meeting are included in Appendix III of this document.

Tourism-based concerns

Bruce Hyer and Vern Fish, oppose year-round harvesting of these areas and request that harvesting be limited to winter harvest. They also requested that it would be preferable to defer the Rocky Road Area for the entire Draft FMP. This position was supported by Dr. Juliee Boan of Environment North. Specific submissions, comments and suggestions made in the meeting or in writing later included,



- Operating in the Kellar, D’Alton and Rocky Road areas will jeopardize the remoteness of the area and have negative effects on, tourism, and caribou values. Harvesting of these areas should be deferred until the Park Management Plan for Wabakimi Provincial Park and additional caribou surveys are completed.

- Specifically, harvesting of the Rocky Road area should be deferred until the next forest management plan. This area is close to important canoe routes through the Boiling Sand River and access to Wabakimi Provincial Park. This is justified by both science and Crown Land Use Policy (G2616: Caribou Lake / Wabakimi).

Caribou-based concerns

The following concerns pertaining to caribou were expressed by Vern Fish, Bruce Hyer, and Dr. Julie Boan.

- Winter harvest and winter roads should be prescribed for all areas if a deferral cannot happen. This will help avoid the critical caribou calving and rearing time throughout the late spring and summer.
- Bruce Hyer Identified that there are areas in all 3 blocks that have site class 2-3. which research shows that site class 2-4 are the most important to caribou. Stocking is low and productivity is moderate at best.
- The issue is not about caribou, but the greater risk to sustainable management. The outcome must be sustainable otherwise it is going to have adverse impacts for all stakeholders. The goal is for the forest to do what it would normally do without anthropogenic interference. The province should apply the “insurance policy” outlined in the Woodland Caribou Conservation Plan (2009).

Whitesand First Nation

Whitesand First Nation had an opposing perspective and wanted greater flexibility for already constrained logging operations. The community communicated its perspective that it has already made enough concessions to protect tourism and caribou values during the planning process. Gull Bay First Nation, The Métis Nation of Ontario and the Red Sky Métis Independent Nation all supported Whitesand First Nation’s submissions.

Specific comments and suggestions made in the meeting or in writing later, by Chief Gustafson, Clifford Tibishkogijig, Beth Boon, David Mackett and Craig Toset are listed,

- Whitesand First Nation has a history of accommodating the needs of others in their traditional territory and feel they have worked in good faith on this Draft FMP to develop a suitable set of protections for all values. Adding these last-minute

changes proposed to restrict season or defer harvest in the issue resolution requests will produce a plan that is not sustainable for the community members of Whitesand First Nation.

- Chief Gustafson noted that additional constraints prevent the ability to grow the communities of Whitesand First Nation and Armstrong that currently suffer

economically due to lack of employment opportunities and ability to provide services required.

- Community representatives from Gull Bay First Nation raised similar concerns about the impact of caribou-oriented constraints on the economic and social interests of the members of Gull Bay First Nation.
- The restrictions that exist already make it difficult to maintain and grow harvesting capacity. It is difficult to retain and attract trained staff if harvesting cannot occur year-round.
- David Mackett (Director from Sagatay Cogeneration and Sagatay Wood Pellets) noted that sustained year-round wood flow to the Bioeconomy Centre is needed to avoid temporal or permanent shutdowns, jeopardising our energy security. The Bioeconomy Centre is a shovel-ready project consisting of a 5 MW biomass cogeneration plant and a pellet plant that has been developed through a 13-year tripartite partnership between Canada, Ontario and Whitesand First Nation.

Resolute Forest Products

Beau Johnson from Resolute Forest Products was also in support of additional flexibility in logging operations and opposed the proposed limitation of harvest in the specified areas to winter harvest only. Beau provided the following,

- Year-round operations allow Sagatay the opportunity to adjust operations accordingly and operate year-round. Operations will take 3 years from start to finish, renewal and deactivation will take 1-2 years (in the Rocky Road area). Any additional restrictions will increase the time it takes to harvest, which will be detrimental to caribou and commercial tourism.
 - On this forest, we have found that the site classification in the inventory may indicate is summer operations, but ground truthing has identified that many sites are more suitable for winter harvest. The Plan must have flexibility to accommodate these discrepancies during actual operations.
- Several changes have already been made to the Plan to accommodate requests made by Mr. Hyer (e.g., Changes made to centre line of corridor to move it further away from Wabakimi, modified landing so block road is not accessible, renamed road to “Rocky Road” instead of “Tamarack Lake Road” to not flag the potential for lake access and the development of a tourism AOC in the Tamarack Lake area.

Decision

My decision is as follows,

1. For the Kellar Road area I am not requiring any changes to the Draft Forest Management Plan.
2. for the D’Alton block area I am not requiring any changes to the Draft Forest Management Plan.

3. For the Rocky Road area, I am requiring an alteration to the Draft FMP to include an additional indicator of sustainability in the objectives table (Table FMP-10 Assessment of Objective Achievement). The indicator will be included under management objective 8. Social and Economic: Involvement in Forest Management Plan development and implementation. To protect social values in the area, all harvest and silviculture activities should be completed within five years of the first harvest taking place within the westerly portion of the Rocky Road area (identified on the image in Appendix II and on the attached map).

This indicator will measure whether forest operations were conducted within the desired timeframe to protect the social values of concern within the area.

In making this decision, careful consideration was also given to the following,

- The Issue Resolution requests received,
- Past Forest Management Plans,
- The tourism, fish, and wildlife values in these areas,
- Crown Land Use Policy,
- Past Steering Committee decisions made in the course of developing the Draft

FMP ,

- This Long-Term Management Direction in the Draft FMP,
- The requirements of the *Crown Forest Sustainability Act, 1994*, the Forest

Management Planning Manual, Forest Operations and Silviculture Manual,

Forest Information Manual, other relevant policies, and guides,

- The input of my staff.

All three of these areas were forecasted for harvest as part of the Long-Term Management Direction (LTMD) and the overall sustainability of the Draft FMP was assessed based on that LTMD.

These areas are also part of the Dynamic Caribou Habitat Schedule (DCHS) portion of the Draft FMP which is designed to provide for the long-term supply of caribou habitat. To defer harvesting of large areas within existing and partially completed caribou blocks runs contrary to the strategic planning that has occurred. Deferral of harvest in these strategically prescribed areas would reduce the overall wood supply for this Draft FMP and the resultant DCHS would contain blocks that were more unevenly aged than intended and would thus have a negative impact to the sustainability of the plan.

Winter-only harvest of areas sensitive to caribou and tourism can sometimes be a reasonable compromise, but this is a forest that is already heavily constrained by timing restrictions, and I recognize the challenge of the local harvesting operators to maintain

consistent wood flows and retain skilled staff. Winter-only harvesting also prolongs the time that a logging operation must remain in each area which can have additional negative effects on tourism and caribou values.

Operational planning has occurred in these areas and the Draft FMP includes a number of protections for local values. The area of concern prescriptions and road decommissioning strategies in the Draft FMP are more extensive than most other approved plans and will provide sufficient protections for most concerns raised regarding these areas. Many of the area of concern prescriptions have much larger no harvest reserves and seasonal timing restrictions around lakes in waterbodies than is found in other FMP's. The road decommissioning strategies in the areas of the forest where Issue Resolution was requested have an objective to rehabilitate the former road surface by promoting a forest structure and composition consistent with adjacent forest conditions.

I am also sensitive to the interests of Whitesand First Nation and the other Indigenous communities and peoples in the area to participate in the economic benefits of forestry. My decision attempts to balance these interests with tourism and recreational-based interests in the area.

Concerns were expressed by many for the Rocky Road area, and I recognize the proximity of this area to important canoe routes outside of Wabakimi Provincial Park. This area has often been described as important caribou habitat. The Draft FMP includes a number of restrictions and other forms of protection on all known values within the Rocky Road area. These include but are not limited to, area of concern prescriptions to protect the park, water quality, lake trout, and tourism. As there is no known and verified caribou values present in this area at this time there is no area of concern prescription applied for caribou in this location of the forest. Values updates can occur at anytime during the development or implementation of a forest management plan and if such a time were to occur where values are identified and validated by MNRF appropriate area of concern prescriptions will need to be applied.

I thank you for bringing your concerns to my attention and your participation in the issue resolution process. If you have any questions regarding my decision, please feel free to contact the Regional Planning Forester Mitchell Legros at 807-620-0478 or mitchell.legros@ontario.ca.

Sincerely,

Rik Aikman
A/Regional Director, Northwest Region Ministry of Natural Resources and Forestry

Encl.

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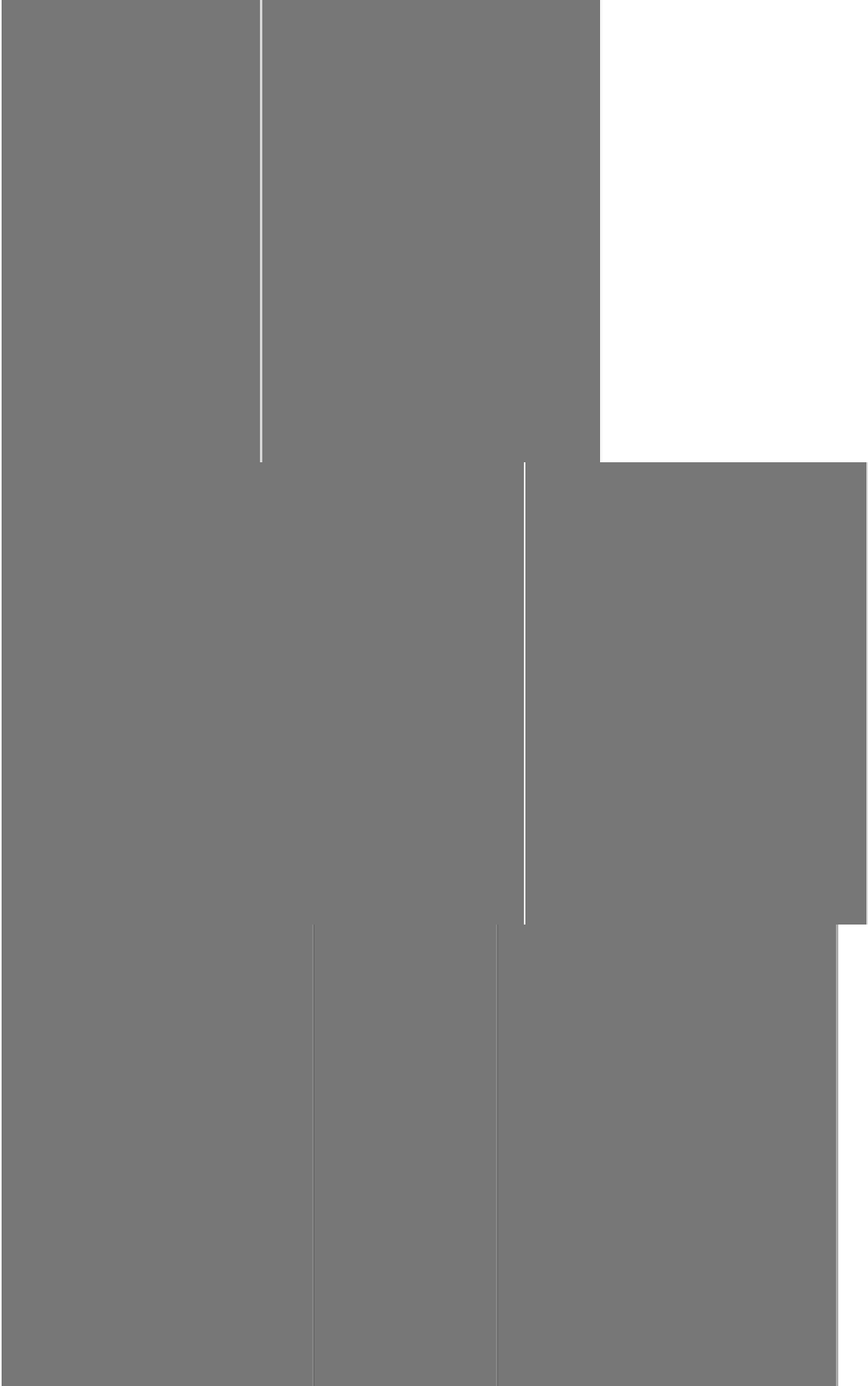
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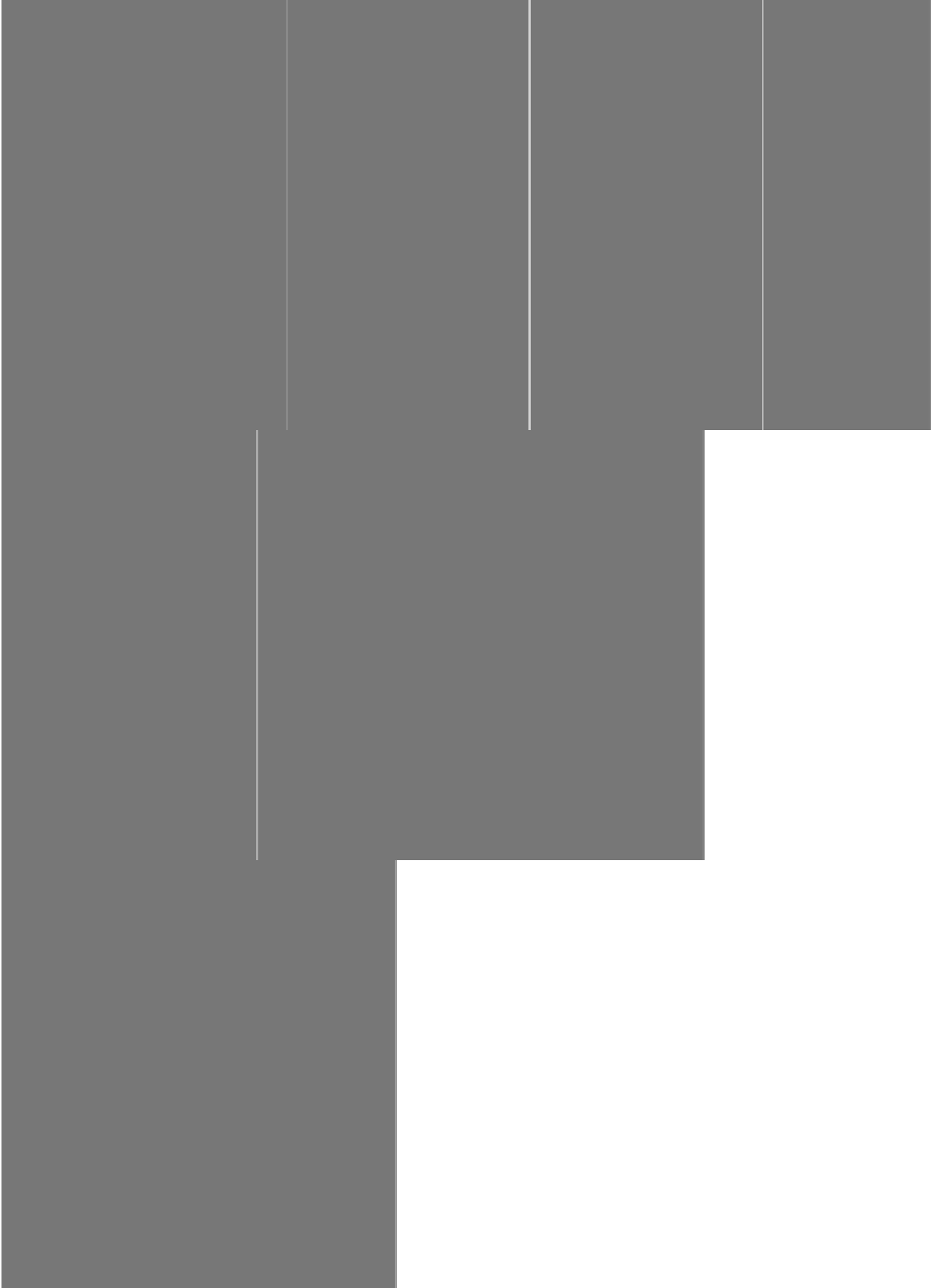






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Appendix I

Reason for indicator/ Background for this Indicator

This indicator of sustainability was required by the Regional Director as part of the (January 10, 2023) issue resolution decision. The intent of this indicator is to ensure that harvest and renewal activities in the area are completed in as short a time as practical.

Objective 8 and Indicator #8.5: Completion of harvest and renewal activities in westerly portion of Rocky Road within five years of commencement.

Timing of Assessment: Enhanced Annual Reports.

How the Indicator is Measured: This indicator tracks whether harvesting and silviculture renewal activities have been completed within the five-year timeframe as specified in the Regional Director's decision. [The Year Five and Final Year Annual Reports will document the status of forest operations in the westerly portion of the Rocky Road area including, but not limited to: the date MNR receives a start-up notification for the area; once started, the date of the five year deadline to complete harvest and renewal activities; the most recent year in which harvest activities took place; the most recent year in which renewal activities took place; the proportion of the harvested area that has received all required renewal activities; and, if any, a description of the remaining renewal activities to be undertaken.]

Desirable Level: All harvest and renewal activities completed within five years of commencement of harvest.

Rationale for Desirable and Target Levels:

Harvesting and renewing the forest in as short a time as practical will be most beneficial for wildlife and would most likely be prolonged with further seasonal timing restrictions. Imbedding this concept in an indicator of the plan will ensure that harvest and renewal activities in the area are completed in as short a time as practical.

Assessment: (implementation only)

The assessment will document the start of harvesting activities and end of silviculture renewal activities. If needed a rationale will be included for the reasons why harvesting was not completed in the specified 5-year time frame.

LTMD - Projections

Management Objective

8. Social and Economic: Involvement in forest management plan development and implementation.

Indicator

Indicator #8.5:

Plan Start Level

Desirable Level

harvesting and silviculture renewal activities have been completed within the five- year timeframe

Timing of Assessment

Target

Short (10yrs)

Medium Long

(20 yrs)

(100 Assessment yrs)

Completion of harvest and renewal activities in the westerly portion of Rocky Road within five years of commencement

N/A

Year Five and Final Year Annual Reports

same as Desirable Level

N/A

N/A N/A

(if applicable this will be filled out during the respective Enhanced annual report)

Appendix II



Appendix III

Participants in December 6th meeting

Alan Cheeseman Anthony King
Beau Johnson, R.P. F. Beth Boon

Bruce Hyer
Clement Quenville Clifford Tibishkogijig Courtney Korbyck Danielle Berube Dave
McTeague Diane Laybourne
Did not identify when called upon
Don Elliot
Donelda DeLaRonde Gerry Racey
Jamie Mucha
Jeff Cameron, R.P. F. Jim Doblej
Jim Kwandebance Joy Neill
Julee Boan

Marian Scaffeo Mark Schildt

Wilderness North

Gull Bay First Nation

Resolute Forest Products

Gull Bay First Nation

Armstrong LCC, First Alternate

Whitesand First Nation

Whitesand First Nation

MNRF – Regional Resources Liaison Specialist MNRF – Regional Planning Biologist

Friends of Wabakimi

Sagatay ARDC

Sagatay

Mattice Lake Outfitter

Red Sky Métis Independent Nation Representative Armstrong LLC, Second Alternate

MNRF – Resource Management Supervisor NorthWinds Environmental Services

Whitesand First Nation

Trapper, Tamarack Area

Bear Paw Lodge

Environment North

MNRF – Planning Intern Forrest Lodge

Attendees	Affiliation
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Kevin Ride	MNRF - Regional Resources Manager
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Attendees	Affiliation
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Maurice Poulin	Mitch Legros, R.P.F.	Rainy Wilson
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Ray Tallent		
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Rik Aikman		
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Robin Kuzyk, R.P.F.	Scott Galloway	
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Tim Sinclair		
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Trent Desaulniers	Triin Hart	
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Vern Fish		
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Armstrong LCC/Friends of Wabakimi MNRF	Regional Planning Forester	Whitesand
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First Nation		
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Friends of Wabakimi		
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MNRF – Acting Regional Director
MNRF – Thunder Bay District Management Forester MNRF – Acting District Manager
Métis Nation of Ontario
Métis Nation of Ontario
NorthWinds Environmental Services
Friends of Wabakimi

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