

Wabadowgang Noopming 2023-2033 FMP Summary of Public Consultation

Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Respondent	PT Response
2021-2023 Contingency Plan and 2023-2033 FMP	1	9	03-Feb-20	Individual had concerns with potential increase in access to the proposed primary road corridor north of Caribou Lake (Dalton, Hollingsworth primary road). Concerned about spawning ground and fishing pressure that a road can bring)		PLAN Author – various options associated with protecting values exist such as AOC for lakes and river, access restriction for roads... Plan author will need to investigate this issue further during operational planning
2021-2023 Contingency Plan and 2023-2033 FMP	2	9	04-Feb-20	Individual wanted to know about the Birch stands location near the WFN reserve and how/if they can be protected from outside interest that want to harvest chaga. Also, if a permit is required to harvest birch stands		Plan author send a map of Birch stands near the WFN reserve. Plan author explained that currently there is no market for Birch treed and therefore, the company is avoiding harvesting pure birch stands. A permit is always required to harvest any tree on crown land. Even if the tree is being used for personal firewood to heat a home - see the MNR Link for more information on this. - https://www.ontario.ca/page/using-wood-crown-land-personal-use
2021-2023 Contingency Plan and 2023-2033 FMP	3	1	11-Feb-20	The park is aware of the proposed DCHS Block AB-3 under the 2023-33 plan. This block is located just to the southeast of Whitewater lake and adjacent to the WPP boundary. There is no concern related to the allocation of the plan, but have some concerns with regard to protecting park values (primarily Woodland Caribou, a species at risk and their habitat). The Park wants to ensure that concerns and recommendations are considered. The primary concerns and rationale for the concerns are the following. 1)Primary Concern #1 Vulnerability to stand conversion: This block can be described as dominated by peaty terrain over silty sands on a lacustrine plain with eskers (Reference to the geology/soils map attached). The FRI stands are conifer dominated with patches of deciduous trees interspersed. From the aerial imagery you can see much of this area is low and wet. The silty sands overtopped by peaty materials are highly vulnerable to conversion to deciduous when the mineral soil is disturbed and exposed. Therefore, in order to minimize disturbance to mineral soil, it might be best to harvest this block in the winter if possible. Keeping in mind the concern for conversion may be an important consideration from a renewal perspective as well., 2) Primary Concern #2 Road construction and linear corridors: roads in general provide linear corridors for wolves and the construction disturbs the mineral soil to allow more deciduous trees to take over. A secondary road would be preferred over a primary road as there would be less overall disturbance/less permanence and it would be easier to rehabilitate back to coniferous forest. Decommissioning and rehabilitation measures would be highly recommended.		Meeting occurred on March 4 with Wabakimi Park Biologist, Wabakimi Park Superintendent, MNR regional Forester, MNR regional Biologist and the Plan Author (NWES). Concerns were discussed through high level discussion around current FMP AOC, Landscape guide and normal silviculture practice and road use strategy's in DCHS area. An update related to Collins community discussions was also given. Meeting was positive and WPP staff were pleased with the outcome. All parties agreed to keep in touch through the development of the FMP.

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2021-2023 Contingency Plan and 2023-2033 FMP	3	1	12-Feb-20	<p>The park is aware of the proposed DCHS Block AB-3 under the 2023-33 plan. This block is located just to the southeast of Whitewater lake and adjacent to the WPP boundary. There is no concern related to the allocation of the plan, but have some concerns with regard to protecting park values (primarily Woodland Caribou, a species at risk and their habitat). The Park wants to ensure that concerns and recommendations are considered. The primary concerns and rationale for the concerns are the following. 1)Primary Concern #1 Vulnerability to stand conversion: This block can be described as dominated by peaty terrain over silty sands on a lacustrine plain with eskers (Reference to the geology/soils map attached). The FRI stands are conifer dominated with patches of deciduous trees interspersed. From the aerial imagery you can see much of this area is low and wet. The silty sands overtopped by peaty materials are highly vulnerable to conversion to deciduous when the mineral soil is disturbed and exposed. Therefore, in order to minimize disturbance to mineral soil, it might be best to harvest this block in the winter if possible. Keeping in mind the concern for conversion may be an important consideration from a renewal perspective as well., 2) Primary Concern #2 Road construction and linear corridors: roads in general provide linear corridors for wolves and the construction disturbs the mineral soil to allow more deciduous trees to take over. A secondary road would be preferred over a primary road as there would be less overall disturbance/less permanence and it would be easier to rehabilitate back to coniferous forest. Decommissioning and rehabilitation measures would be highly recommended.</p>		<p>Meeting occurred on March 4 with Wabakimi Park Biologist, Wabakimi Park Superintendent, MNRF regional Forester, MNRF regional Biologist and the Plan Author (NWES). Concerns were discussed through high level discussion around current FMP AOC, Landscape guide and normal silviculture practice and road use strategy's in DCHS area. An update related to Collins community discussions was also given. Meeting was positive and WPP staff were pleased with the outcome. All parties agreed to keep in touch through the development of the FMP.</p>

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2021-2023 Contingency Plan and 2023-2033 FMP	5	9	12-Jul-20	<p><u>Dalton Road Extension</u>• There is concern that roads will be unnecessarily built in the northern portion of the Wabadowgang Noopming Forest. In particular, there is disagreement surrounding the creation of the proposed Dalton Road extension (Alternative 1), and the potential transition of the Dalton Road from a Branch Road to a Primary Road corridor. • There is worry regarding the long-term access that this road would give near significant remote tourism facilities on the north end of Caribou Lake, but also the potentially negative impact it may have on caribou habitat. • It is believed that the primary access to the north part of the forest should respect the previous solemnly argued primary access strategy.<u>Risk Analysis</u>• A commendation was given to the Planning Team for how the Risk Analysis identified significant issues and the consequences of failing to meet assumptions that have been made in the LTMD development. • However, it was stated that they seem to be naïve in terms of feasibility and practicality and that there should be more importance placed on finding ways to solve these problems, rather than just identifying them. <u>Silviculture and Caribou Habitat</u>• The WN Forest cannot afford to be treated as an experiment in vegetation management, as we only get one chance to avoid further shifts to mixed wood and hardwood-dominated stands. • Without staying within the IQR for caribou winter habitat, caribou and other species reliant on conifers would suffer. • It is recommended that further modelling be done to ensure that the levels of caribou winter habitat do not fall below the IQR, and to show more progress in improving the all-ages upland conifer levels.<u>Yield Curves and Wood Supply</u>• There is concern regarding the adjustments of the yield curves to account for losses in density due to the snow-down event in the early 2000s. It is believed that these situations will become more common, and the Planning Team may be over-projecting harvest volumes of SPF, which would not be good for caribou or the conifer forest units on the WN Forest. • It is believed that because of the breakage/blowdown, and crown loss from past insect infestations that have occurred on the conifers forest units, there has been an increased regeneration of white birch and balsam fir which may not be adequately accounted for. This will create challenges for post-harvest succession rules. • The insight from these two considerations should lead to an increased sense of precaution, and these risks should be addressed during the operational planning phase.</p>		No response requested

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2021-2023 Contingency Plan and 2023-2033 FMP	6	2	2020-07-21 and 2020-02-18	<ul style="list-style-type: none"> • It is believed that the proposed LTMD has done the best it can to balance the habitat needs of caribou with other economic and social needs. • It has been pointed out that the LTMD summary does not include discussion of the economic impacts of wilderness canoeing tourism on the local community, and does not identify the current or future possibilities related to these activities. • The proposed Dalton and Trail Lake Roads could potentially provide access to known canoe routes across Crown Land, and those routes within the WN Forest can provide access to Wabakimi Park canoe routes. However, access is limited by existing road management rules that deny recreational access to these primary roads. • Recommended has been given that additional thought is put into allowing recreational access to primary roads within the WN Forest. In particular: 1) to access the south end of Big Lake via Big Lake/Dalton Road, which would further provide access to several lakes north of Whitesand Provincial Park. 2) to access Wabakimi Park and a web of lakes south of the railroad, via Trail Lake Road. • Recommendation for access points along the road with enough space for a vehicle to pull over and unload. • Due to the proposed Dalton Road crossing four mapped historic canoe routes (Caribou Lake to Michell Lake, Kellar Bay to Cumaway Lake, Kellar Bay to Linklater Lake, and Kellar Bay to Hollingsworth Lake) it is expected that best practices would be followed to avoid obliterating these canoe routes/portages. 		<p>Response sent by MNR - Thank you for your thoughts regarding the Raymond River canoe route. The current forest management plan for the Lake Nipigon Forest appears to identify the canoe route of concern. There are also prescriptions for canoe routes and trails in the current forest management plan. For your reference, this link https://www.efmp.lrc.gov.on.ca/eFMP/home.do will provide you with access to all forest management plans in the province. If you should need assistance navigating through the site, please feel free to get in touch and I would be happy to help.</p> <p>Planning is ongoing for the Armstrong Forest. A link to Ontario's Environmental Registry is included for your reference https://ero.ontario.ca/notice/019-0605. At this time operational planning has not occurred. This would be the appropriate time for consideration of values that you have identified. You have been added to the mailing list and should be notified of public involvement opportunities. I encourage you to refer to Ontario's Environmental Registry for notices related to the forest management planning process. Plan Author (NWES) was able to arrange a meeting with the LCC member (Friends of WPP). The meeting was on the phone and occur in June of 2020. The plan author was able to answer questions related to the FMP such as road planning, allocations and road use management strategies.</p>
2021-2023 Contingency Plan and 2023-2033 FMP	7	9	30-Jul-20	<ul style="list-style-type: none"> • There has been feedback suggesting that the community of Whitesand has not been properly consulted in the Forest Management process and that a Forest Management Plan for the Wabadowgang Noopming Forest is unnecessary. • It is believed that off-reserve and worldwide membership had no avenue of being consulted, nor was there a website to actively engage with information. • It was stated that the socio-political climate of the community is volatile and unstable and that decisions have been made by community leaders regarding this plan, without the input of the entire community. 		No response requested

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2023-2033 FMP Stage 2	22	11	09/29/2021	At the behest of the steering committee the regional planning Forrester was tasked with reaching out to a group of stakeholders that would be impacted with the construction of a primary Rd to facilitate more information to the steering committee. Specifically the Regional planning forester was task with inquiring about how proposed road options would impact the business.	Mitchell Legros	Variety of responses was provided back to the regional planning forester ranging from i. Severe economic hardships experienced by stakeholders if any option besides number six was selected four primary Rd corridors to ii. Do to the geographic location of the individuals there would be no impact.
2023-2033 FMP Stage 2	22	2	01/10/2022	Stakeholder Group submitted Letter with concerns that fall under the following topics: 1) Ecological integrity and sustainability i. Expressed concerns for the boiling sands river system and other sensitive sites in CLUPA 2616 (Caribou Lake, Cambell-Hollingsworth Triangle, D'Alton Block and Doe-Fawn Lake Complex) as they are important to caribou 2) Maintaining a healthy and sustainable woodland caribou population i. Looking for modified or deferral of operations in areas of the forest 3. Protect lakes that support Lake Trout 4. Protect exceptional recreation and tourism values adjacent to Wabakimi Park: i. Want to see adherence to CLUPA 2616	Jeff Camron	<p>You identified areas in your letter as sensitive and requested to have special consideration taken to protect woodland caribou and other wildlife values. In your letter you suggested that these areas be considered for addition to Wabakimi Provincial Park or be considered for protection as Conservation Reserves. As we discussed, the land use designation falls outside the scope of the development of the FMP, though the specific land use policies (e.g. G2616) provide important context for the FMP.</p> <p>At our meeting we also discussed your concern regarding the lack of a Park Management Plan for Wabakimi Provincial Park. As you mentioned in your letter, the interim strategy for items such as access, remain status quo. Currently there are Public Lands Act access restrictions that include vehicle access restrictions to the Park, and these would remain in place. Regarding undue access to sensitive areas of the Park, the planning team is also seeking input directly from MECP on how to protect these ecological values.</p> <p>As mentioned, CLUPA policy provides context for the FMP. The G2616 policy includes specific direction on the management of natural lake trout lakes. For this reason, planned operations within CLUPA G2616 will include Area of Concern (AOC) prescriptions that follow this direction.</p> <p>Maintaining caribou habitat over the long term is a major consideration in the development of the FMP. An example of caribou habitat protection at the site level is the AOC prescription for woodland caribou calving and nursery lakes (AOC ID "CAR-1").</p> <p>Consistent with CLUPA G2616, the FMP will also have consideration for commercial tourism and recreation values. The planning team acknowledges the perception of remoteness as a value that may be addressed through the road use management strategies and AOC's in the FMP.</p> <p>Caribou Lake/Campbell - Hollingsworth Triangle area - Operational Map grid ID: D4 The preferred primary access (steering committee decision) to this area is planned to occur via the McKinley Rd and then travel north of Hollingsworth Lake. Branch road access directly north of Caribou Lake is proposed via the Kellar Rd. Protection of values at this road location would be through application of a temporary road zone (no permanent road) and a seasonal timing restriction (no road building</p>

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						<p>from April 30th to October 1st). Planned harvest along the north of Caribou Lake is proposed to be accessed by a branch road.</p> <p>D'Alton block - Operational Map grid ID: E4 and D4 Areas of Concern and road use management strategies were developed in past plans and the current intent for proposed operations for the 2023 FMP is to maintain the intent of these road use management strategies and AOC's.</p> <p>Doe-Fawn Lake Complex - Operational Map grid ID: F2 and F3 Access to this area is proposed via the Trail Lake primary road coming from the east (operational roads will be upgraded) and the new Tamarack Lake Road would be built to access allocations just north of the CN railway. The road use management strategy for Tamarack Lake Road and associated operational roads are documented in Table FMP-18. Following completion of forestry operations, the Tamarack Lake Road and associated operational roads would be decommissioned.</p> <p>Road Use Management Strategy for Caribou Lake/Campbell - Hollingsworth Triangle area, D'Alton Block and Doe-Fawn Lake Complex Following completion of forestry operations, the Tamarack Lake Road, Kellar road and D'Alton road (and associated operational roads) are planned to be decommissioned. The decommissioning activity will focus on maintaining the capable caribou habitat of the areas.</p>

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2023-2033 FMP Stage 3	23	12	03/12/2022 1	<p>I urge you to seriously reconsider, cancel, or at least significantly scale back the proposed road building and logging proposals near Wabakimi Provincial Park and other Crown Lands.</p> <p>I am particularly concerned about Trail Lake, D'Alton, and Kellar Road</p>	<p>Mitchell Legros 05/27/2022</p>	<p>CLUPA 2616 of Provincial crown land policy A III IV, B V VI reply: CLUPA G2616 is a General Use Area that includes unique guidance and considerations for commercial tourism and fish and wildlife habitat. The specific land use intent is outlined below. LAND USE INTENT: The Policy Report for general use area G2616 clearly states that commercial timber harvest is permitted. The Land Use Intent then indicates the importance of tourism in the area and this direction becomes part of the consideration during the forest management planning process. This process, which strives to balance social, economic and environmental factors for a forest management unit to produce a forest management plan that is sustainable for all parties involved, is required to consider the direction and intent in the CLUPA policy report. The forest management plan is also required to consider the values and needs of other stakeholders on the forest. A I II, B IV a b C I II III and D II III Reply: The forest management plan is also required to follow the manuals and guides which includes protection measures for woodland Caribou. An example of caribou habitat protection at the site level is the AOC prescription for woodland caribou calving and nursery lakes (AOC ID "CAR-1"). Lakes that have confirmed lake trout in them will have the "LT" area of concern prescription apply to them (full area of concern prescription attached for your review). Trail Lake road extension B I, III and V Reply: The planning team has considered the use of winter roads, but is unable to commit to using winter roads only, due to two important reasons: 1) Summer access in the short term is critical to allow silviculture activities to occur within the harvest area (i.e. site prep, tree planting and monitoring activities) and 2) Operational flexibility is key to maintaining year-round employment for the small local workforce.</p> <p>The operational task team feels a combination of three following value protection mechanisms in the forest management plan will affectively address your concerns. B II Reply: There are two types of stands that match the description you provided in your comment. 1. Stands that have shallow soils fall into the following ecosites (ecosite is ecological land classification for forested stand based on the vegetation present as well as the soil texture) 11-19, 23-28. Recent research has indicated that if the stands are 80 years of age or younger they must be harvested using a Tree Length or Cut To Length logging method to maintain adequate nutrients to facilitate forest regeneration 2. The other type of low productivity forested stands are classified as protected forest.</p> <p>D'Alton Road between the D'Alton Block and the north end of Caribou Lake</p>

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						<p>C I II Reply: In addition to the aforementioned standard protections that Caribou already receive (A I II, B IV a b C I II III and D II III Reply) there are other mutually beneficial area of concern prescriptions such as a 750m reserve along Caribou and Hollingsworth Lakes with only temporary roads permitted within 1.6km.</p> <p>C IV Reply: This hypothesized migration route was previously identified to the planning team and was considered in the determination of primary access to the northwest corner of the forest.</p> <p>Kellar Road. All the reasons stated for the D'Alton Road also apply to the Kellar Road.</p> <p>D I Reply: previous stakeholders have identified potential for a walleye spawning area close to this location however currently there is no verified value in the NRF's database.</p> <p>D IV Reply: To limit the availability of a Keller Branch road corridor and the operations around it to only be constructed and used during the winter months or irrespective of the ecological and edaphic factors on the landscape is not a fair trade off from the Planning teams perspective</p>

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2023-2033 FMP Stage 3	24	13	03/11/2022	I have concerns regarding the 2023-2033 forest management plan, especially with regard to its effect on the Caribou population. I would hope that their habitat could be protected, and any possible impact very carefully considered, particularly given the lack of any specific park management plan.	Mitchell Legros 05/27/2022	<p>In your email dated March 11th, 2022, to the plan author Jeffrey Cameron, you indicated you had concerns about how the forest management plan would impact Caribou Population. Specifically, you indicated you hoped that the habitat would be protected and at any potential impact was carefully considered.</p> <p>When developing a forest management plan in the boreal forest region planning teams must ensure that the guide direction for protecting Caribou habitat outlined in the forest management guide for managing boreal landscapes is included in the plan (Forest management: boreal landscapes ontario.ca). Within this guide there is direction the planning teams must follow that is hypothesized to ensure there is sufficient current and future habitat for Caribou. This is done by planning harvest in a manner that would provide forest composition and structure similar to what would be found in a natural disturbance driven forest.</p> <p>Where there are specific known and verified values such as Caribou calving and nursery areas on the forest the planning team must have an area of concern prescription in place. This area of concern ensures the area and the buffer around is not disturbed during the calving and nursery period of May 1st to August 15th. I have attached the full area of concern prescription in the email as well for your review.</p>
2023-2033 FMP Stage 3	25	14	03/12/2022	Stakeholder visited Tamarac lake and boiling sands river. believes if logging is to be allowed in this area the perception of remoteness and wilderness will be removed in the future. asking the planning team to reconsider the logging up to the edge of tamarack lake and Caribou lake as they believe there will be detrimental impacts on wildlife in Wabakimi an the commercial tourism industry. makes reference to crown land use policy 2616 which states that extractive activities such as timber harvesting "...will remain secondary" and that "Road access will be managed to maintain commercial tourism and fish and wildlife habitat."	Mitchell Legros 05/27/2022	<p>CLUPA G2616 is a General Use Area that includes unique guidance and considerations for commercial tourism and fish and wildlife habitat. The specific land use intent is outlined below. LAND USE INTENT: The Policy Report for general use area G2616 clearly states that commercial timber harvest is permitted. The Land Use Intent then indicates the importance of tourism in the area and this direction becomes part of the consideration during the forest management planning process. This process, which strives to balance social, economic and environmental factors for a forest management unit to produce a forest management plan that is sustainable for all parties involved, is required to consider the direction and intent in the CLUPA policy report. In addition, the forest management plan is also required to consider the values and needs of other stakeholders on the forest.</p> <p>The planning team will use tools available to them to mitigate the impacts that logging could potentially have on the remoteness of this area. The planning team has been provided or will develop Area of Concern Prescriptions (AOC's) and Road Used Management Strategies (RUMS).</p>

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2023-2033 FMP Stage 3	26	15		<p>Keep existing roads as winter roads only and please do not resurface them as this only contributes to causing further damage. Existing logging should be temporary only, and not an industry that is expanding further into these habitats.</p> <p>The potential threat to woodland caribou breeding grounds and the disruption to their migration is so worrying not just for Canada but for the world as a whole. Walleye spawning grounds are also such a precious resource and the potential threat to these is also very concerning.</p> <p>Please do not proceed with your plans as envisaged and please listen to the views of those whose primary objective is not about the extraction of resources and wealth, but rather is preserve and pass on to future generations what we still have and not leave them with a damaged environment.</p>	Mitchell Legros 05/27/2022	<p>Many of the areas in CLUPA 2616 have been logged in the past and were able to provide sufficient road decommissioning and area of concern prescription protections. These areas eventually fell into disrepair and were able to provide the current level of remoteness for Wabakimi provincial park. The primary road corridors or branch road corridors identified in this area will use mostly existing roads that were previously used to other areas network close to Wabakimi provincial park</p> <p>The planning team will use tools available to them to mitigate the impacts that logging could potentially have on the remoteness of this area. The planning team has been provided or will develop Area of Concern Prescriptions (AOC's) and Road Used Management Strategies (RUMS)</p> <p>When developing a forest management plan In the boreal forest region planning teams must ensure that the guide direction for protecting Caribou habitat outlined in the forest management guide for managing boreal landscapes is included in the plan (Forest management: boreal landscapes ontario.ca). Within this guide there is direction the planning teams must follow that is hypothesized to ensure these is sufficient current and future habitat for Caribou. This is done by planning harvest in a manner that would provide forest composition and structure similar to what would be found in a natural disturbance driven forest.</p>
2023-2033 FMP Stage 3	26	16	03/12/2022	<p>Keep existing roads as winter roads only and please do not resurface them as this only contributes to causing further damage. Existing logging should be temporary only, and not an industry that is expanding further into these habitats.</p> <p>The potential threat to woodland caribou breeding grounds and the disruption to their migration is so worrying not just for Canada but for the world as a whole. Walleye spawning grounds are also such a precious resource and the potential threat to these is also very concerning.</p> <p>Please do not proceed with your plans as envisaged and please listen to the views of those whose primary objective is not about the extraction of resources and wealth, but rather is preserve and pass on to future generations what we still have and not leave them with a damaged environment.</p>	Mitchell Legros 06/23/2022	<p>When developing a forest management plan in the boreal forest region planning teams must ensure that the guide direction for protecting Caribou habitat outlined in the forest management guide for managing boreal landscapes is included in the plan (Forest management: boreal landscapes ontario.ca). Within this guide there is direction the planning teams must follow that is hypothesized to ensure there is sufficient current and future habitat for Caribou. This is done by planning harvest in a manner that would provide forest composition and structure similar to what would be found in a natural disturbance driven forest. A contrast from some of the areas study area identified in the article would be the type of natural disturbance we are trying to emulate. In the boreal forest of Ontario we plan to manipulate forest cover in a manner that would emulate large stand replacing fire. By planning to have large continuous swaths of disturbed forests we would be creating a forest condition with less edge affect which will create less advantageous habitat for alternative prey species for wolves. Additionally the edaphic and climatic characteristics on this forest management unit lend themselves to be less advantageous for the regeneration of herbaceous species than study areas identified</p> <p>https://www.for.gov.bc.ca/hre/becweb/resources/classificationreports/provincial/ in the paper so when comparing components of the paper to the specific geographic area on this forest it's hard to draw any conclusions.</p> <p>Some of the operational considerations we have that speak to your specific concerns are:</p> <ol style="list-style-type: none"> 1. Road Decommissioning strategies and, 2. Area of Concern Prescriptions (AOC).

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2023-2033 FMP Stage 3	27	17	03/13/2022	<p>I can't help but think that logging in the area, right up to the eastern boundaries of Wabakimi are bound to negatively impact the park in many ways, but I'm mostly concerned with recreational use. I understand the economic impact of forestry can be beneficial to local communities but that should be balanced with the needs of other stakeholders, including recreational users, who often are only considered in terms of the money they bring to an area's economy.</p> <p>I'll end with an entreaty to please consider regular users of the parks, past, present and future. A lot of people worked very hard to make that park a reality. A lot of people garner a great amount of pleasure through the use of Wabakimi, and other parks as well. I hope that many future generations will have the same opportunities to enjoy the wilderness as I have. I have daughters that back country camp that I hope I can get up there in the future as well.</p>	Mitchell Legros 06/23/2022	<p>When developing a forest management plan there several factors that planning teams consider when producing a plan that adequately addresses the needs of all stakeholders on the forest. One of them you mentioned, the perception of remoteness and the maintenance of that perception is an important value for many recreationalists and resource-based tourism operators. There are several mechanisms within this forest management plan such as the area of concern prescription AOC for parks that designed to ensure that parks are protected from unwanted access (I have attached the Parks AOC for your reference). Additionally, there is Road Decommissioning strategies which are intended to identify the level of decommissioning required in specific geographic areas based on the values present as well as the balancing of objectives in the forest management plan (I've attached table FMP 18 with the Road Decommissioning strategies detailed description). One of the factors we can consider when determining a sufficient level of Road decommissioning would be preventing easy access to the area for individuals who would like to enter park in a non designated location. One considering the application of either the standard AOC or the Road Decommissioning strategy it must go through the decision-making body for the plan which is the planning team. The planning team reviews constraints ensure that it's addition on the landscape is able to occur without disproportionately impacting other objectives on the forest.</p> <p>An additional factor that is used to protect the perception of remoteness on this forest is the public lands act signs which restrict road access or stake holders on the forest to protect resource-based tourism outposts as well as parks. These signs are outside the decision-making ability of the planning team and assigned by the</p>

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						<p>District Manager and can also be found in table FMP 18.</p> <p>See comment 23 for templated summary of reply</p>
<p>2023-2033 FMP Stage 3</p>	<p>28</p>	<p>8</p>	<p>03/14/2022</p>	<p>A) Trail Lake road extension</p> <p>In quick order of preference, from least destructive to most destructive, here are the preferences for that area of proposed harvest:</p> <p>1) No harvesting at all in the 2023-33 plan. This would allow time to consider alternatives more carefully, and especially to allow time for the completion of a Wabakimi Park management plan. It would allow time to do a thorough wildlife assessment for the area, especially on caribou utilization. Remove or berm the road from the water crossing to Tamarack Lake access point, to prevent overuse and degradation of a very small river. It would allow and foster some use by accessing Tamarack Lake by canoeists utilizing existing and potential air carriers.</p> <p>2) Defer harvesting for 10 years (next plan), and allow the present rough road to exist until there is a park management plan to plan access. The existing road is marginal or worse for most ordinary cars, but the existing canoe outfitters can and do use 4 WD trucks to access it.</p> <p>3) Winter harvest only with true winter roads, (no gravel, becoming impassable for cars and trucks in the non-winter).</p> <p>It is unacceptable and unsustainable for several important values for any roads utilizing gravel to proceed past the water crossing. Those values include:</p> <ul style="list-style-type: none"> • A threatened species, woodland caribou, at the 	<p>Mitchell Legros 05/27/2022</p>	<p>A) Trail Lake road extension</p> <p>The first two options you provided are essentially the same course of action for this FMP so the response has been grouped into one reply. Deferring these areas is not an option for this 10 year FMP as it is designed to manipulate forest cover in a manner that would emulate large landscape disturbance and the intent of these areas is to be fully depleted after the 10 year FMP. Deferring these areas would disproportionately put pressure on other components of the forest management plan.</p> <p>The use of winter roads in the whole area is also not an acceptable option as it potentially could drag out the length of operations in these areas longer than what would be necessary and there will inevitably need to be road upgrades even during the winter that would improve access than what is currently present.</p> <p>The Planning team feels a combination of three following value protection mechanisms in the forest management plan will affectively address your concern.</p> <p>PARKS area of concern prescription provided by the Ministry of Environment Conservation and Parks (MECP) has been put in place which has numerous access restriction intended protections (full AOC has been attached in this email for your review). These roads have been identified as being in suitable or capable Caribou habitat and thus are candidates for Aggressive decommissioning strategies which are intended to leave the former road surface in a state commensurate with the silviculture efforts in the adjacent cut blocks. Lastly after operations have been completed in the area of Trail Lake road the bridge accessing this portion of the forest will be planned for removal.</p> <p>In your letter you also commented on Tamarack Lake potentially containing lake trout. We followed up with MECP To confirm if there have ever been any lake trout observations validated in this location and they have confirmed that there isn't any currently.</p> <p>B) Additional road proximity to the northern portion of Caribou Lake.</p>

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				<p>southern limit of their range, currently utilizing that area year round.</p> <ul style="list-style-type: none"> • Shallow soils and site fragility in most of the area. • Lake Trout (Tamarack, Gnome, and Collins Lakes) <p>B) Additional road proximity to the northern portion of Caribou Lake.</p> <ul style="list-style-type: none"> • There should be no harvesting within at least 1 km of the north end of Caribou Lake. • There should not be a single km of non-winter roads within at least 1 km of the north end of Caribou Lake. • Any harvesting or roads between 1-3 km of the north end of Caribou Lake and anywhere in proximity to Campbell and Hollingsworth Lake must be winter only, wit gravel used. 		<p>To defer more area around such a large lake in the forest management unit would create issues with the other stakeholders we try to balance objectives within forest management plan. This would effectively make large portions of harvest north of Caribou lake inoperable and compromise landscape level objectives for forest cover manipulation when compared to the levels identified in the long term management direction.</p> <p>To limit the availability of a Keller Branch road corridor and the operations around it to only be constructed and used during the winter months irrespective of the ecological and edaphic factors on landscape is not acceptable from the operational task teams perspective.</p> <p>if there are specific locations within this three kilometre area you wish to discuss customize area of concern prescriptions the operational task team it is more than happy to review and consider these however at this time the large 3 kilometre constraint for winter roads is not agreeable.</p>
2023-2033 FMP Stage 3	29	18	03/15/2022	express concern that the draft Section 11 Conservation Agreement between Environment and Climate Change Canada and the Government of Ontario will do nothing to benefit or recover boreal caribou.	Mitchell Legros 03/21/2022	Thanks for comment and directed stakeholder to correct Posting.
2023-2033 FMP Stage 3	30	19	03/13/2022	<p>The use of our provincial park system is increasing considerably. As our population grows and population densities increase the impact on our more accessible and well loved parks is considerable. Use of back country areas has led to new booking policies, reservations, and planning ahead. Those not able to commit to wilderness trips six months in advance often loose the opportunity. More and varied resources are required and Wabakimi Provincial Park is one of them.</p> <p>Parks can not exist in a vacuum. While Wabakimi is of considerable size, some of its important features can not exist if surrounding areas are adversely impacted through forest operations. Wabakimi is known for the potential for woodland caribou sightings. Maintaining their population will have repercussions outside the park proper.</p> <p>Economic spinoffs over time will be more consistent through use of the park than they will be through forest operations. The park use will be increasing as pressure on more accessible parks make them either over capacity or undesirable to many.</p>	Mitchell Legros 06/23/2022	<p>There are several factors that planning teams consider when producing a plan that adequately addresses the needs of all stakeholders on the forest. One of them you mentioned, the maintenance of remoteness. This is an important value for many recreationalists and resource-based tourism operators There are several mechanisms within this forest management plan such as the area of concern prescription AOC for parks that designed to ensure that parks are protected from unwanted access (I have attached the Parks AOC for your reference). Additionally, there is Road Decommissioning strategies which are intended to identify the level of decommissioning required in specific geographic areas based on the values present as well as the balancing of objectives in the forest management plan (I've attached table FMP 18 with the Road Decommissioning strategies detailed description). One of the factors we can consider when determining a sufficient level of Road decommissioning would be preventing easy access to the area for individuals who would like to enter park in a non designated location. One considering the application of either the standard AOC or the Road Decommissioning strategy it must go through the decision-making body for the plan which is the planning team. The planning team reviews constraints to ensure that it's addition on the landscape is able to occur without disproportionately impacting other objectives on the forest.</p> <p>An additional factor that is used to protect the perception of remoteness on this forest is the public lands act signs which restrict road access or stake holders on the forest to protect resource-based tourism outposts as well as parks. These signs are outside the</p>

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						<p>decision-making ability of the planning team and assigned by the District Manager and can also be found in table FMP 18.</p> <p>When developing a forest management plan in the boreal forest region planning teams must ensure that the guide direction for protecting Caribou habitat outlined in the forest management guide for managing boreal landscapes is included in the plan (Forest management: boreal landscapes ontario.ca). Within this guide there is direction the planning teams must follow that is hypothesized to ensure there is sufficient current and future habitat for Caribou. This is done by planning harvest in a manner that would provide forest composition and structure similar to what would be found in a natural disturbance driven forest.</p> <p>Where there are specific known and verified values such as Caribou calving and nursery areas on the forest the planning team must have an area of concern prescription in place.</p>

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2023-2033 FMP Stage 3	31	20	03/12/2022	<p>In particular, we are concerned about the proposed extensions to the Trail Lake Road in the area of Tamarack Lake, and the D'Alton and Kellar Roads in the area of Caribou Lake. These are important areas of woodland caribou habitat, lake trout habitat, and pickerel spawning. Limiting further road development and harvesting activities in these areas will help to protect these habitats, both by reducing habitat loss as well as by limiting tourism traffic to levels that remain sustainable for the protection of the ecosystem from overuse.</p> <ul style="list-style-type: none"> Any extensions to the Trail Lake Road must be very temporary, winter-only roads, facilitating only winter harvesting activities (and preferably deferred until the next 10-year FMP). Any extensions to the Kellar Road must also be extremely temporary, winter-only roads, facilitating only winter harvesting, and should especially avoid caribou calving areas on Caribou Lake and Hollingsworth Lake. The proposed secondary road extension to the D'Alton Road should be cancelled or deferred and no further gravel roads should be constructed beyond the current point. Any access and harvesting in the area of the D'Alton Block should be very temporary and winter only. 	Mitchell Legros 06/23/2022	<p>CLUPA 2616 of Provincial crown land policy A III IV, B V VI reply: CLUPA G2616 is a General Use Area that includes unique guidance and considerations for commercial tourism and fish and wildlife habitat. The specific land use intent is outlined below.</p> <p>LAND USE INTENT: The Policy Report for general use area G2616 clearly states that commercial timber harvest is permitted. The Land Use Intent then indicates the importance of tourism in the area and this direction becomes part of the consideration during the forest management planning process. This process, which strives to balance social, economic and environmental factors for a forest management unit to produce a forest management plan that is sustainable for all parties involved, is required to consider the direction and intent in the CLUPA policy report. The forest management plan is also required to consider the values and needs of other stakeholders on the forest.</p> <p>A I II, B IV a b C I II III and D II III Reply: The forest management plan is also required to follow the manuals and guides which includes protection measures for woodland Caribou. An example of caribou habitat protection at the site level is the AOC prescription for woodland caribou calving and nursery lakes (AOC ID "CAR-1"). Lakes that have confirmed lake trout in them will have the "LT" area of concern prescription apply to them (full area of concern prescription attached for your review).</p> <p>Trail Lake road extension B I, III and V Reply: The planning team has considered the use of winter roads, but is unable to commit to using winter roads only, due to two important reasons: 1) Summer access in the short term is critical to allow silviculture activities to occur within the harvest area (i.e. site prep, tree planting and monitoring activities) and 2) Operational flexibility is key to maintaining year-round employment for the small local workforce.</p> <p>The operational task team feels a combination of three following value protection mechanisms in the forest management plan will affectively address your concerns.</p> <p>B II Reply: There are two types of stands that match the description you provided in your comment.</p> <ol style="list-style-type: none"> Stands that have shallow soils fall into the following ecosites (ecosite is ecological land classification for forested stand based on the vegetation present as well as the soil texture) 11-19, 23-28. Recent research has indicated that if the stands are 80 years of age or younger they must be harvested using a Tree Length or Cut To Length logging method to maintain adequate nutrients to facilitate forest regeneration The other type of low productivity forested stands are classified as protected forest. <p>D'Alton Road between the D'Alton Block and the north end of Caribou Lake</p>

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						<p>C I II Reply: In addition to the aforementioned standard protections that Caribou already receive (A I II, B IV a b C I II III and D II III Reply) there are other mutually beneficial area of concern prescriptions such as a 750m reserve along Caribou and Hollingsworth Lakes with only temporary roads permitted within 1.6km.</p> <p>C IV Reply: This hypothesized migration route was previously identified to the planning team and was considered in the determination of primary access to the northwest corner of the forest.</p> <p>Kellar Road. All the reasons stated for the D'Alton Road also apply to the Kellar Road.</p> <p>D I Reply: previous stakeholders have identified potential for a walleye spawning area close to this location however currently there is no verified value in the NRF's database.</p> <p>D IV Reply: To limit the availability of a Keller Branch road corridor and the operations around it to only be constructed and used during the winter months or irrespective of the ecological and edaphic factors on the landscape is not a fair trade off from the Planning teams perspective</p>

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2023-2033 FMP Stage 3	32	21	03/11/2022	<p>Please leave our parks, our wildlife oases untouched and encroached upon. For example, roads right to the park boundary creates traffic, noise and disruption within the park. Wildlife (like our beloved caribou for example) need space to thrive.</p> <p>I know forestry is an important industry, and I am fully in support of sustainable forestry; however, every square foot we take away from our parks, we likely will never restore, so they should be off limits entirely.</p>	Mitchell Legros 06/23/2022	<p>When developing a forest management plan there several factors that planning teams consider when producing a plan that adequately addresses the needs of all stakeholders on the forest. One of them you mentioned, the perception of remoteness and the maintenance of that perception is an important value for many recreationalists and resource-based tourism operators. There are several mechanisms within this forest management plan such as the area of concern prescription AOC for parks that designed to ensure that parks are protected from unwanted access (I have attached the Parks AOC for your reference). Additionally, there is Road Decommissioning strategies which are intended to identify the level of decommissioning required in specific geographic areas based on the values present as well as the balancing of objectives in the forest management plan (I've attached table FMP 18 with the Road Decommissioning strategies detailed description). One of the factors we can consider when determining a sufficient level of Road decommissioning would be preventing easy access to the area for individuals who would like to enter park in a non designated location. One considering the application of either the standard AOC or the Road Decommissioning strategy it must go through the decision-making body for the plan which is the planning team. The planning team reviews constraints ensure that it's addition on the landscape is able to occur without disproportionately impacting other objectives on the forest. An additional factor that is used to protect the perception of remoteness on this forest is the public lands act signs which restrict road access or stake holders on the forest to protect resource-based tourism outposts as well as parks. These signs are outside the decision-making ability of the planning team and assigned by the District Manager and can also be found in table FMP 18. lastly like to ensure you that any park located on the forest management unit is not available to be included in forest management plan for harvest area and there are no new proposed road crossings in any park on this forest management unit.</p>
2023-2033 FMP Stage 3	33	22	03/13/2022	<p>utterly stunned that anyone would consider making inroads into Wabakimi park. Road ways will spoil this remote paradise. End of story.</p> <p>I have been travelling to Nakina for the past 20 years, and I can attest to the damage done to any body of water or wilderness area- and the native fish and game- when road access becomes to easy. Have you heard of the Grand Banks off of our east coast?? Too much access allows for pillaging of resources.</p>	Mitchell Legros 06/23/2022	<p>There are several factors that planning teams consider when producing a plan that adequately addresses the needs of all stakeholders on the forest. One of them you mentioned, the maintenance of remoteness. Specifically you indicated interest in how the protection of the values that rely on this remoteness will be protected. This is an important value for many recreationalists and resource-based tourism operators. There are several mechanisms within this forest management plan such as the area of concern prescription AOC for parks that is designed to ensure that parks are protected from unwanted access (I have attached the Parks AOC for your reference). Additionally, there is Road Decommissioning strategies which are intended to identify the level of decommissioning required in specific geographic areas based on the values present as well as the balancing of objectives in the forest management plan (I've attached table FMP 18 with the Road Decommissioning strategies detailed description). One of the factors we can consider when determining a sufficient level of Road decommissioning would be preventing easy access to the area for individuals who would like</p>

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						<p>to enter the park in a non designated location. When considering the application of either the standard AOC or the Road Decommissioning strategy it must go through the decision-making body for the plan which is the planning team. The planning team reviews constraints to ensure that it's addition on the landscape is able to occur without disproportionately impacting other objectives on the forest. An additional factor that is used to protect the perception of remoteness on this forest is the public lands act signs which restrict road access or stake holders on the forest to protect resource-based tourism outposts as well as parks. These signs are outside the decision-making ability of the planning team and are assigned by the District Manager and can also be found in table FMP 18.</p> <p>See comment 23 for templated summary of reply</p>
2023-2033 FMP Stage 3	34	23	03/12/2022	<p>Regarding the Trail Lake Road Extension (a), D'Alton Rd (b), Keller Rd(c).</p> <p>All potentially threaten already threatened woodland caribou populations for the following reasons: (a) this is in the area of year round caribou habitat (b) caribou calving grounds on Caribou Lake (c) caribou calving area and migration routes</p> <p>Caribou populations in Alaska and NW territories have been decimated by the creation of access roads for commercial purposes, most notable the near extinction (if not total extinction of the Beverly herd). Even limited use roads create later access for ATVs and 4 by 4 vehicles to recreate and further disturb the ecosystem.</p> <p>Regarding (b) and (c) runoff threatens existing lake trout populations and walleye spawning grounds.</p> <p>Regarding (a) I would prefer to have the existing primitive road through which I and many others have accessed Wabakimi.</p> <p>Any logging roads in or near the park should be winter access only but having said that I would maintain that logging roads in these areas threaten the semi remote nature of the access points to this park and as mentioned access roads become later access points for motorized recreation vehicles the use of which disturbs wildlife and tourists (during peak season).</p> <p>It is my understanding that current policy (CLUPA2616) prioritizes wildlife protection, protection</p>	Mitchell Legros 05/27/2022	See comment 23 for templated summary of reply

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				of existing fisheries and recreational considerations over commercial concerns.		
2023-2033 FMP Stage 3	35	24	03/13/2022	I would like to request the amendment of Access Restriction S4, by the removal of just "Lee" from the signage at the Lee Lake Rd and Airport/Pikitungushi Rd junction, and the signage on the Airport/Pikitungushi rd at the Armstrong town limits.	Robin Kuzyk	public lands act signs are outside the scope of the PT decision making power is there a district manager decision. District will follow up
2023-2033 FMP Stage 3	36	25	03/11/2022	<p>I'm from the states and am planning to canoe Wabakimi this summer. We chose Wabakimi for its remoteness and the wildlife that abounds there not to mention the fishing.</p> <p>By logging, and road building all those things I mentioned are In Jeopardy. Nothing should be done to the park until there is a comprehensive management plan for it.</p>	Mitchell Legros 06/23/2022	There are several factors that planning teams consider when producing a plan that adequately addresses the needs of all stakeholders on the forest. One of them you mentioned, the maintenance of remoteness and by extension the conservation of values dependent upon the remoteness. There are several mechanisms within this forest management plan such as the area of concern prescription AOC for parks that designed to ensure that parks are protected from unwanted access (I have attached the Parks AOC for your reference). Additionally, there is Road Decommissioning strategies which are intended to identify the level of decommissioning required in specific geographic areas based on the values present as well as the balancing of objectives in the forest management plan (I've attached table FMP 18 with the Road Decommissioning strategies detailed description). One of the factors we can consider when determining a sufficient level of Road decommissioning would be preventing easy access to the area for individuals who would like to enter the park in a non designated location. When considering the application of either the standard AOC or the Road Decommissioning strategy it must go through the decision-making body for the plan which is the planning team. The planning team reviews constraints to ensure that it's addition on the

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						<p>landscape is able to occur without disproportionately impacting other objectives on the forest.</p> <p>An additional factor that is used to protect the perception of remoteness on this forest is the public lands act signs which restrict road access or stake holders on the forest to protect resource-based tourism outposts as well as parks. These signs are outside the decision-making ability of the planning team and assigned by the District Manager and can also be found in table FMP 18.</p>
2023-2033 FMP Stage 3	37	26	03/12/2022	<p>• Ongoing consultation and recommendations put forth by representatives of the Whitesand First Nation are given priority.</p> <ul style="list-style-type: none"> • Protection and preservation of the diverse natural, cultural and historical resources of the Wabakimi Area are honoured and maintained. • More specifically, the recommendations of the FOW Stage 3 Comments letter addressed to you on January 10, 2022, be given serious consideration. • Details of the CLUPA 2616 are adhered to. 	Mitchell Legros 06/23/2022	<p>We can assure you when developing a forest management plan planning teams consider all the input provided and the specific examples you noted above have not only received consideration but have provided the planning team direct input for the development of the 2023-2033 forest management plan and will continue to do so. When developing a forest management plan planning teams strive to obtain a balance of social, economic and environmental objectives that meets the current and future needs of the forest and the communities that rely on it. When it comes to balancing these objectives it often leads to spirited conversations on how best to achieve this balance and it is the planning team's job to objectively analyze all the components and understand the trade-offs and make a recommendation in the form of the final forest management plan to the regional director for approval.</p> <p>There are certainly specific points that can be identified that would demonstrate how any of the points you mentioned above have received consideration. However, when looking at a forest management plan no one planned operation or decision is often attributed to an individual source. I hope that our reply has provide you some assurances that the planning team provides adequate consideration for points you mentioned. If you have any further questions feel free to reach out to myself or any other member on the planning team.</p>
2023-2033 FMP Stage 3	38	27	03/11/2022	<p>I am writing to inform you that I am opposed to any logging in or near the Wabakimi Provincial Park. This wilderness area needs to be protected from commercial interests. I have visited the part as a tourist on several occasions. Logging would have a very negative affect on this valuable resource.</p>	Mitchell Legros 06/23/2022	<p>There are several factors that planning teams consider when producing a plan that adequately addresses the needs of all stakeholders on the forest. One of them you mentioned, the maintenance of remoteness and by extension the conservation of values dependent upon the remoteness. There are several mechanisms within this forest management plan such as the area of concern prescription AOC for parks that are designed to ensure that parks are protected from unwanted access (I have attached the Parks AOC for your reference). Additionally, there is Road Decommissioning strategies which are intended to identify the level of decommissioning required in specific geographic areas based on the values present as well as the balancing of objectives in the forest management plan (I've attached table FMP 18 with the Road Decommissioning strategies detailed description). One of the factors we can consider when determining a sufficient level of Road</p>

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						decommissioning would be preventing easy access to the area for individuals who would like to enter the park in a non designated location. When considering the application of either the standard AOC or the Road Decommissioning strategy it must go through the decision-making body for the plan which is the planning team. The planning team reviews constraints to ensure that it's addition on the landscape is able to occur without disproportionately impacting other objectives on the forest. An additional factor that is used to protect the perception of remoteness on this forest is the public lands act signs which restrict road access or stakeholders on the forest to protect resource-based tourism outposts as well as parks. These signs are outside the decision-making ability of the planning team and assigned by the District Manager and can also be found in table FMP 18.
2023-2033 FMP Stage 3	39	28	03/13/2022	<p>1) Trail Lake Road extension</p> <ul style="list-style-type: none"> • must maintain the existing low quality road to the Tamarack Lake area and beyond. • No tree harvesting in the area. The trees are small low value at best and given the low soil depth, will not take replanting. • Any and all access beyond Tamarack should be temporary: winter roads only, with no gravel, and be totally unusable by trucks or cars in summer. <p>The important values there include:</p> <ul style="list-style-type: none"> • important year-round caribou habitat at the very bottom and limits of their range, in all seasons. • Lake trout • Road access to the Boiling Sand River will cause significant damage to ecological and park values, particularly unless and until there is a park plan to manage and limit such access. • Current and potential ecotourism values, including remote fly-in canoe outfitting benefits to local outfitters and economy. <p>2) D'Alton Road between the D'Alton Block and the north end of Caribou Lake: critical values to be protected there, as we have previously mentioned, include:</p> <ul style="list-style-type: none"> • Caribou Calving on Caribou Lake. Predator access will be enhanced by any road access nearby. All disturbance must be minimized. • Caribou migration routes • Caribou Lake is an important lake trout lake • The north end of Caribou Lake is already the most important non-airplane access point for canoeists (both customers of commercial tourism and general canoeing public) into Wabakimi (indeed almost the only one!) That will only increase in use and importance. It must remain semi-remote, as it is now. 	Mitchell Legros 06/23/2022	See comment 23 for templated summary of reply

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				<p>Therefore, The proposed secondary road extension is unacceptable. There should be no roads with gravel beyond the current point, Any access and logging in this plan should be very temporary, and winter only.</p> <p>3) Kellar Road. All the reasons stated for the D'Alton Road also apply to the Kellar Road. Plus:</p> <ul style="list-style-type: none"> • important walleye spawning area • remote lake trout lakes • The are Caribou calving areas on Caribou Lake and Hollingsworth Lake, very close to the proposed road. <p>The Kellar Road must be extremely temporary, and preferably winter roads and harvesting only.</p>		

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2023-2033 FMP Stage 3	40	29	03/12/2022	<p>we are opposed to any logging in CLUPA 2616 in the vicinity of Wabakimi Provincial Park and Caribou Lake. The part of the park near CLUPA 2616 is inhabited by Woodland Caribou. It contains trout and walleye fisheries. It contains Crown Land used for recreation, and contains essential routes for canoeing and ecotourism. And areas proposed for logging immediately border Wabakimi Provincial Park.</p> <ul style="list-style-type: none"> • We oppose logging that establishes any upgrades to roads (i.e. Trail Lake Road, D'Alton Road, and Kellar Road) because improvement and/or extension of roads will increase successful predation on Woodland Caribou especially during calving and will put increase stress on an already fragile population. • We oppose logging in this area because it will degrade water quality and increase sedimentation in trout streams and spawning areas for trout and walleye • We oppose logging because it degrades the wilderness values in an area highly valued by commercial tourists. A loss of tourism will disrupt the tourism economy in the region. 	Mitchell Legros 06/23/2022	<p>In your comment to the planning team you specifically identified how harvesting has changed the composition of the white pine and hemlock stands in the northern part of your home state. These stands or type of forest you described are not present in the Wabadowgang Noopming Forest. In Ontario those types of forests and stands predominantly fall in the Great Lakes St. Lawrence forested region and have very different logging practices than in the Boreal region which the Wabadowgang Noopming Forest is located in. The boreal forest region in Ontario is largely driven by stand replacing fires which we try to emulate through our harvesting and silvicultural practices. Essentially we try to manipulate the forest cover in a manner that would produce a forest structure and composition that would be found in a pre industrial (or Natural) forest state. The direction and methodology for how this is done is outlined in the forest management guide for managing boreal landscapes(Forest management: boreal landscapes ontario.ca). In this guide the word emulate is selected very carefully because through our harvesting practices we cannot perfectly mimic the impacts of a standard placing fire. However, based on the research that supported this guide in many others the clearcut silviculture system is hypothesized as the best way to manipulate forest cover and emulate the impacts stand replacing fires on the landscape have. In absence of forest operations and in the era of fire suppression the forest cover and structure on this landscape will reach a over mature state which is not indicative of the natural or pre industrial forested state. So when developing a forest management plan the planning team tries to manipulate the forest cover in a manner that best balance is not only the ecological components of the forest but tries to balance the social and economic values of the forest as well to produce a plan that is sustainable for all users on the forest.</p> <p>See comment 23 for templated summary of reply</p>

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Respondent	PT Response
2023-2033 FMP Stage 3	41	30	03/13/2022	<p>1) Trail Lake Road extension must maintain the existing low quality road to the Tamarack Lake area and beyond. Harvesting must be only winter, if at all. Again, preferably deferred until the next plan (beyond 2033, when hopefully there WILL be a park management plan.) Any and all access beyond Tamarack should be temporary: winter roads only, with no gravel, and be totally unusable by trucks or cars in summer.</p> <p>The important values there include: important year-round caribou habitat at the very bottom and limits of their range, in all seasons. Lake trout Road access to the Boiling Sand River will cause significant damage to ecological and park values, particularly unless and until there is a park plan to manage and limit such access. Current and potential ecotourism values, including remote fly-in canoe outfitting benefits to local outfitters and economy.</p> <p>2) D'Alton Road between the D'Alton Block and the north end of Caribou Lake: critical values to be protected there, as we have previously mentioned, include: Caribou Calving on Caribou Lake. Predator access will be enhanced by any road access nearby. All disturbance must be minimized. Caribou migration routes Caribou Lake is an important lake trout lake The north end of Caribou Lake is already the most important non-airplane access point for canoeists (both customers of commercial tourism and general canoeing public) into Wabakimi (indeed almost the only one!) That will only increase in use and importance. It must remain semi-remote, as it is now.</p> <p>Therefore, The proposed secondary road extension is unacceptable. There should be no roads with gravel beyond the current point, Any access and logging in this plan should be very temporary, and winter only.</p> <p>3) Kellar Road. All the reasons stated for the D'Alton Road also apply to the Kellar Road. Plus: important walleye spawning area remote lake trout lakes The are Caribou calving areas on Caribou Lake and Hollingsworth Lake, very close to the proposed road. The Kellar Road must be extremely temporary, and preferably winter roads and harvesting only.</p>	Mitchell Legros 06/23/2022	See comment 23 for templated summary of reply

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2023-2033 FMP Stage 3	42	31	03/13/2022	<p>Over the last two summers, I have worked and vacationed near Wabakimi Park and Armstrong Station. I have come to love this area's pristine forests and abundant wildlife. This area is unlike any place in the rest have Canada that has become road accessible and logged.</p> <p>I plan to spend most of next summer canoeing and documenting nature in near and in Wabakimi Park with still photography and videos.</p> <p>I am writing to you to advocate on behalf of all the species in the area which thrive as a result of limited human exploitation, that can't speak to you or write emails.</p> <p>Please resist the pressure to make decisions for short term economic benefits at the expense of the longterm health of the forest ecosystems.</p> <p>A forest ecosystem is more than just trees and fiber. A healthy forest includes all the vertebrates and invertebrates, plants, and fungi.</p> <p>Please consider the impact of your decisions on all species and the right of future generations to enjoy their nature heritage.</p> <p>I don't want Wabakimi Park to be surrounded by roads and clear cuts like most of the rest of Northern Ontario further south.</p> <p>Please design your forest management plan primarily for the benefit and health of plant, fungi and animal species which have become rare or extirpated elsewhere mostly as a result of roads, resource exploitation and increased accessibility.</p> <p>Please think about the long term consequences of your decisions on key forest health indicator species such as the endangered woodland caribou.</p> <p>At one time, woodland caribou used to range into Minnesota and Wisconsin. Whenever an area has been logged, it turns into moose pasture, and the woodland caribou disappear permanently. I am not aware of any logged areas that have retained healthy woodland caribou populations.</p> <p>These logged over areas have lost most of their biodiversity.</p> <p>As you are developing the Forest Management Plan for this area please consider the impact of your decisions on the right of future generations to know their natural heritage, future biotechnologies that may benefit from genetic diversity and the right of other species besides people to exist and thrive.</p> <p>I am not against sustainable resource exploitation. I just don't believe I have ever witnessed it. I have seen clear cuts, blown down wild life corridors and tree farms. These areas are no longer truly wild and have</p>	Mitchell Legros 06/23/2022	<p>Many of the broad concerns about how the manipulation of forest cover will impact the ecological function of an ecosystem are addressed in forest management planning with the theory of the coarse filter and fine filter approach. Essentially the coarse filter approach to forest management planning is by emulating the natural disturbance pattern that would be found in a pre industrial forested state we should be providing the conditions the ecosystem in the area have adapted to (see page 17 Forest Management Guide for Boreal Landscapes (ontario.ca) of the note this guide is commonly referred to as the Boreal Landscape Guide (BLG)). When developing a forest management plan planning teams are required to measure forest composition and structural indicators through a 160 year horizon (Page 28 of the BLG). This long term planning is known as the Long Term Management Direction (LTMD). When measuring the compositional indicators planning teams strive to move the indicators towards or maintain within the simulated range of natural variation (otherwise known as the amount of that indicator that would be present on the forest in a natural forested state driven by fire). So by moving towards or maintaining within the simulated range of natural variation it is hypothesize that planning the manipulation of forest cover in a manner that is consistent with the LTMD projections we are providing a sustainable amount of habitat for the 10 year forest management plan.</p> <p>Operationally the best way manipulate forest cover via harvesting system while emulating a standard placing fire which would be the main vector of disturbance in the boreal forest is the clearcut silviculture system (section 3.1.2 Forest Management Guide to Silviculture in the Great Lakes-St. Lawrence and Boreal Forests of Ontario ontario.ca). By creating these open conditions it is likely to lead to a compositional shift in the Fungi an invertebrate community as well.</p> <p>A second specific concern you outlined in your letter was the persistence of woodland Caribou. When developing a forest management plan in the boreal forest region planning teams must ensure that the guide direction for protecting Caribou habitat outlined in the forest management guide for managing boreal landscapes is included in the plan (page 15 of BLG). Within this guide there is direction the planning teams must follow that is hypothesized to ensure there is sufficient current and future habitat for Caribou. This is done by planning harvest in a manner that would provide forest composition and structure similar to what would be found in a natural disturbance driven forest which is effectively the same hypothesis as described above.</p> <p>See comment 23 for templated summary of reply</p>

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				<p>most of what makes them ecologically significant. This is your chance to accomplish something, no one else has achieved with a FMP; Preserve a forest's biodiversity of species and biodiversity with species.</p>		

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Respondent	PT Response
2023-2033 FMP Stage 3	43	32	03/08/2022	<p>I am not in favour of spraying to make the forest mainly conifer. If Quebec can harvest the forest there for 20 years without spraying why can we not do likewise? Sprayed areas lack bees, birds and other wildlife for several years. Blueberries, raspberries and mushrooms are all gone for many years- probably the rest of my life.</p> <p>We already have a permanent road to the north end of the area even if it needs some updating so why build a new permanent road or even a temporary road through a calving area for caribou? If a road is 100% funded then it should be open for public use as much as possible. I agree with for tourism and sensitive areas being protected. I am sure the mining area will be able to get to their mining by using the northern road. caribou are needing protection but the animals we hunt need an area to thrive complete with plants they eat. Berries for bear, and grouse, Moose need more than evergreens to eat.</p>	Jeff Camron 04/27/2022	<p>Herbicides The planning team recognizes that the use of herbicides on the Wabadowgang Noopming Forest is a contentious issue for the 2023-2033 FMP. The use of herbicides was one of the top issues identified at the desired forest and benefits meeting and continues to be an important subject discussed at the Planning Team and Local Citizens' Committee. During preparation of the FMP, to minimize the use of herbicide, the planning team has developed Silvicultural Ground Rules which don't involve stand conversion (i.e. Hardwood harvest followed by regeneration to pure conifer stands) which typically result in multiple application of herbicide. Also, in July 2020, the Steering Committee made a recommendation to the planning team for the development of an FMP objective related to herbicide use in an effort to address concerns related to herbicide use on the forest. The objective developed is indicated in table FMP-10 and listed below. Objective #9: To improve the responsible usage of herbicides on the Forest</p> <p>Objective #9 had three indicators. These indicators will be used to assess the effectiveness of forest management planning and activities in achieving management objectives</p> <p>Indicator 9.1: Engagement with First Nation and Métis Communities within and adjacent to Wabadowgang Noopming Forest on the careful site selection, planning and clear mapping of treatment areas, during the development of the FMP.</p> <p>Indicator 9.2: Engagement with First Nation and Métis Communities within and adjacent to Wabadowgang Noopming Forest on the careful site selection, planning and clear mapping of treatment areas, during the preparation of the AWS.</p> <p>The Local Citizen Committee and members of the general public will also have the opportunity to review Indicator 9.3: Careful site selection, planning and mapping of conifer renewal areas that may receive aerial tending (herbicide) treatments during plan implementation, through tending assessments and an iterative dialogue with Whitesand First Nation, (and First Nation and Métis communities).</p> <p>Primary road and access restrictions Currently the preferred option to access the northwest corner of the forest is the McKinley Road the D'Alton road is an alternative. After this formal consultation stage, the planning team will be reviewing and replying to the input received to refine the proposed operations into a draft plan which will be available for review tentatively on July 10th 2022.</p> <p>Robin, can you add paragraph indicating access restriction review by the district? The Thunder bay district is currently undergoing a review of current</p>

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						<p>access restriction on the Wabadowgang Noopming Forest....</p> <p>Wildlife habitat With the implementation of the forest management guides (i.e. Stand and Site Guide - SSG and Boreal Landscape Guide - BLG) a coarse and fine filter approach to wildlife habitat management is implemented. Through the application, measurement and targets of forest landscape classes (coarse filter), forest composition, structure and pattern at the landscape level creates a diversity of ecosystem conditions that addresses the habitat requirements for a range of wildlife species. A fine filter may be required if the ecological requirements of a particular species are not addressed sufficiently through the application of just the coarse filter or if societal/economic aspects of sustainable development required more or less habitat than would be provided by nature. Both the BLG and SSG provide direction and guidance on the application of these filters and are applied in FMP planning.</p>

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2023-2033 FMP Stage 3	44	33	03/09/2022	<p>I JUST WANT TO VOICE MY CONCERNS ABOUT SPRAYING OF THE FOREST AFTER IT IS HARVESTED. WITH SPRAYING YOU KILL THE FLOWERS THAT THE BEES NEED, THE BLUEBERRIES, MUSHROOMS, THE CRANBERRIES AND THE PINCHERRIES. ALLTHESE THINGS WE USE TO MAKE JAMS AND JELLIES AND EAT. YOU ALSO KILL PLANTS THAT WILDLIFE SURVIVESON. WE HUNT BEAR, MOOSE, AND GROUSE. AFTER YOU SPRAY THERE ARE NO WILDLIFE FOR YEARS IN THAT AREA. IF QUEBEC CAN HARVEST THE FOREST WITHOUT SPRAYING THEN SO WE CAN DO THE SAME HEREIN Ontario. ALSO WHY HARVET IN THE CALVING AREA OF THE CARIBOU IF THEY ARE TO BE PROTECTED.</p> <p>WHATEVER HAPPENED TO TRYING TO PROTECT THE WILDLIFE INSTEAD OF DESTROYING. DOES THE MNR DO NOT CAREFOR OUR CONSERVATION ONLY MONEY FROM THE FOREST TRADE. IT USE TO BE SELECTIVE CUTTING NOT CLEAR CUTTING AND THEN SPRAY EVERYTHING SO ONLY CERTAIN TREES CAN GO BACK BECAUSE THAT IS THE ONLY THING THE FORESTY WANTS, EXAMPLE JACK PINE NO BIRCH OR POPULAR.</p> <p>THE OTHER THING IS IF WE CAANOT USE THE ROADS, THEN BUILDING OF THE ROADS SHOULD COME OUT OF THE FORESTRY NOT THE PUBLIC</p>	<p>Jeff Camron 04/27/2022</p>	<p>same reply as comment 43</p>

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Respondent	PT Response
2023-2033 FMP Stage 3	45	34	03/13/2022	<p>There are three areas that I believe are particularly sensitive and require either deferred logging (next plan?) or very special prescriptions. They are all within CLUPA 2616 of Provincial crown land policy, which is supposed to make any possible logging conditional upon and secondary to:</p> <ul style="list-style-type: none"> • Wildlife protection, including threatened woodland caribou. • Fisheries, especially lake trout. • Commercial tourism, including canoeing and ecotourism. • Crown Land recreation. <p>1) Trail Lake Road extension</p> <ul style="list-style-type: none"> • must maintain the existing low quality road to the Tamarack Lake area and beyond. • Harvesting must be only winter, if at all. Again, preferably deferred until the next plan (beyond 2033, when hopefully there WILL be a park management plan.) • Any and all access beyond Tamarack should be temporary: winter roads only, with no gravel, and be totally unusable by trucks or cars in summer. The important values there include: <ul style="list-style-type: none"> • important year-round caribou habitat at the very bottom and limits of their range, in all seasons. • Lake trout • Road access to the Boiling Sand River will cause significant damage to ecological and park values, particularly unless and until there is a park plan to manage and limit such access. • Current and potential ecotourism values, including remote fly-in canoe outfitting benefits to local outfitters and economy. <p>2) D'Alton Road between the D'Alton Block and the north end of Caribou Lake: critical values to be protected there, as we have previously mentioned, include:</p> <ul style="list-style-type: none"> • Caribou Calving on Caribou Lake. Predator access will be enhanced by any road access nearby. All disturbance must be minimized. • Caribou migration routes • Caribou Lake is an important lake trout lake • The north end of Caribou Lake is already the most important non-airplane access point for canoeists (both customers of commercial tourism and general canoeing public) into Wabakimi (indeed almost the only one!) That will only increase in use and importance. It must remain semi-remote, as it is now. Therefore, The proposed secondary road extension is unacceptable. There should be no roads with gravel beyond the current point, Any access and logging in this plan should be very temporary, and winter only. <p>3) Kellar Road. All the reasons stated for the D'Alton Road also apply to the Kellar Road. Plus:</p> <ul style="list-style-type: none"> • important walleye spawning area • remote lake trout 	Mitchell Legros 06/23/2022	See comment 23 for templated summary of reply

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				<p>lakes • The are Caribou calving areas on Caribou Lake and Hollingsworth Lake, very close to the proposed road. The Kellar Road must be extremely temporary, and preferably winter roads and harvesting only.</p>		

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2023-2033 FMP Stage 3	46	35	03/12/2022	<p>There are three areas that I believe are particularly sensitive and require either deferred logging (next FMP plan?) or very special prescriptions. They are all within CLUPA 2616 of Provincial crown land policy, which is supposed to make any possible logging conditional upon and secondary to:</p> <ul style="list-style-type: none"> • Wildlife protection, including threatened woodland caribou • Fisheries, especially lake trout • Commercial tourism, including canoeing and ecotourism • Crown Land recreation <p>Area 1) Proposed road building and logging in the area of Boiling Sand River and Tamarack Lake up to the edge of Wabakimi PP – Trail Lake Road extension:</p> <ul style="list-style-type: none"> • Must maintain the existing low quality road to the Tamarack Lake area and beyond. • Harvesting must be only winter, if at all. Preferably deferred until the next plan (beyond 2033, when hopefully there will be a park management plan.) • Any and all access beyond Tamarack should be temporary: winter roads only, with no gravel, and be totally unusable by trucks or cars in summer. The important values there include: • Important year-round caribou habitat at the very bottom and limits of their range, in all seasons • Lake trout • Road access to the Boiling Sand River will cause significant damage to ecological and park values, particularly unless and until there is a park plan to manage and limit such access • Current and potential ecotourism values, including remote fly-in canoe outfitting benefits to local outfitters and economy <p>Area 2) Proposed road building and logging in the D'Alton Road area between the D'Alton Block and the north end of Caribou Lake:</p> <p>Critical values to be protected there are :</p> <ul style="list-style-type: none"> • Caribou calving on Caribou Lake. Predator access will be enhanced by any road access nearby. All disturbance must be minimized. • Caribou migration routes • Caribou Lake is an important lake trout lake • The north end of Caribou Lake is already the most important non-airplane access point for canoeists (both customers of commercial tourism and general canoeing public) into Wabakimi that will only increase in use and importance. It must remain semi-remote, as it is now! The proposed secondary road extension is unacceptable. There should be no roads with gravel beyond the current point, any access and logging in this plan should be very temporary, and winter only. <p>Area 3) The Kellar Road, right at the top of Caribou Lake, near critical caribou calving and walleye spawning beds:</p> <p>All the reasons stated for the D'Alton Road also apply</p>	Mitchell Legros 06/23/2022	See comment 23 for templated summary of reply

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Respondent	PT Response
				to the Kellar Road. And additionally: • Remote lake trout lakes • There are Caribou calving areas on Caribou Lake and Hollingsworth Lake, very close to the proposed road The Kellar Road must be extremely temporary, and preferably winter roads and harvesting only. The area in and around Wabakimi Park, and within CLUPA 2616 is of world class importance, and merits unusually special considerations and management.		
2023-2033 FMP Stage 3	47	36	03/13/2022	<p>I understand that forestry is an important industry but it should take place in an unobtrusive way as possible and use only temporary access roads where needed. For the park to remain an isolated wilderness, road access to its borders should not be encouraged or increased .</p> <p>In summery , I believe Wabakimi Provincial Park should remain an isolated wilderness for the protection of its unique flora and fauna and a Park Management Plan should be expedited before the next Forest Management Plan is updated 10 years from now.</p>	Mitchell Legros 06/23/2022	<p>There are several factors that planning teams consider when producing a plan that adequately addresses the needs of all stakeholders on the forest. One of them you mentioned, the maintenance of remoteness. This is an important value for many recreationalists and resource-based tourism operators. There are several mechanisms within this forest management plan such as the area of concern prescription AOC for parks that designed to ensure that parks are protected from unwanted access (I have attached the Parks AOC for your reference). Additionally, there is Road Decommissioning strategies which are intended to identify the level of decommissioning required in specific geographic areas based on the values present as well as the balancing of objectives in the forest management plan (I've attached table FMP 18 with the Road Decommissioning strategies detailed description). One of the factors we can consider when determining a sufficient level of Road decommissioning would be preventing easy access to the area for individuals who would like to enter the park in a non designated location. When considering the application of either the standard AOC or the Road Decommissioning strategy it must go through the decision-making body for the plan which is the planning team. The planning team reviews constraints to ensure that it's addition on the landscape is able to occur without disproportionately impacting other objectives on the forest.</p> <p>An additional factor that is used to protect the perception of</p>

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						remoteness on this forest is the public lands act signs which restrict road access or stakeholders on the forest to protect resource-based tourism outposts as well as parks. These signs are outside the decision-making ability of the planning team and assigned by the District Manager and can also be found in table FMP 18.
2023-2033 FMP Stage 3	48	37	03/11/2022	<p>concerned about the proposals being considered at this time regarding possible roads to be built and logging that may continue up to the edge of WPP near Boiling Sand River and Tamarack Lake, as well as east of Caribou Lake and the Keller Road area. These areas are important for caribou habitat and would be great losses to the area if logging were continued in the intended manner.</p> <p>I am asking that the intended logging be deferred in order to be sure that CLUPA policy can be upheld under any logging proceedings. Specifically, it would be of great importance to eliminate any logging plans which threaten to undermine any wildlife protection (particularly with regard to woodland caribou, which calve on Caribou Lake) as well as walleye and lake trout spawning.</p> <p>The Friends of Wabakimi, working with both US and Canadian members, are bringing paddlers to the area more regularly and with the hopes of helping area businesses with general economic recovery from COVID times. This should increase commercial tourism to the area, but will be all for naught if the logging continues as planned and paddlers and ecotourists choose to go elsewhere instead of taking advantage of the beautiful environment that Wabakimi and surrounding Crown Lands have to offer.</p>	Mitchell Legros 06/23/2022	See comment 23 for templated summary of reply
2023-2033 FMP Stage 3	49	38	03/12/2022	<p>Please accept this response. I object to destroying wilderness.</p> <p>Some like cities and they enjoy them. That's fine, we'll always have cities. Some like the country and enjoy it. That's fine, we should have farmland, ranchland and the country. Some like the wilderness and enjoy it. That's fine, but will we always have it? When it is gone, it is gone forever. And when you build roads, you destroy wilderness. When you log, you destroy wilderness.</p>	Mitchell Legros 06/23/2022	Thank you for taking the time to share your perspective on road building and logging. Your comment was brought forward to the planning team as public input for the 2023-2033 Forest Management Plan.

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Respondent	PT Response
2023-2033 FMP Stage 3	50	39	03/13/2022	<p>Want to express my concern for the forestry development along Wabakimi Park.</p> <p>I was there last year and witnessed a woodland caribou on the shores. I've never seen one in 20 years of travel.</p> <p>I am concerned that development will affect their habitat and have negative affects in their population.</p> <p>As an Anishinabe of Treaty 3, I request protection and proper management of the area in the 20 year plan</p>	Mitchell Legros 06/23/2022	<p>Specifically, you indicated that proper protection and management for this area be put in place for the forest management plan.</p> <p>When developing a forest management plan in the boreal forest region planning teams must ensure that the guide direction for protecting Caribou habitat outlined in the forest management guide for managing boreal landscapes is included in the plan (Forest management: boreal landscapes ontario.ca). Within this guide there is direction the planning teams must follow that is hypothesized to ensure there is sufficient current and future habitat for Caribou. This is done by planning harvest in a manner that would provide forest composition and structure similar to what would be found in a natural disturbance driven forest.</p> <p>Where there are specific known and verified values such as Caribou calving and nursery areas on the forest the planning team must have an area of concern prescription in place. This area of concern ensures the area and the buffer around is not disturbed during the calving and nursery period of May 1st to August 15th. I have attached the full area of concern prescription in the email as well for your review.</p> <p>When developing a forest management plan there several factors that planning teams consider when producing a plan that adequately addresses the needs of all stakeholders on the forest. One of them is remoteness and the maintenance of that perception is an important value for many recreationalists and resource-based tourism operators. There are several mechanisms within this forest management plan such as the area of concern prescription AOC for parks that is designed to ensure that parks are protected from forestry operations adjacent to them (I have attached the Parks AOC for your reference). Additionally, there is Road Decommissioning strategies which are intended to identify the level of decommissioning required in specific geographic areas based on the values present as well as the balancing of objectives in the forest management plan (I've attached table FMP 18 with the Road Decommissioning strategies detailed description). One of the factors we can consider when determining a sufficient level of Road decommissioning would be preventing easy access to the area for individuals who would like to enter a park in a non designated location. When considering the application of either the standard AOC or the Road Decommissioning strategy it must go through the decision-making body for the plan which is the planning team. The planning team reviews constraints and ensure that it's addition on the landscape is able to occur without disproportionately impacting other objectives on the forest.</p>

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2023-2033 FMP Stage 3	51	40	03/13/2022	<p>There are three areas that I believe are particularly sensitive and require either deferred logging (next FMP plan?) or very special prescriptions. They are all within CLUPA 2616 of Provincial crown land policy, which is supposed to make any possible logging conditional upon and secondary to:</p> <ul style="list-style-type: none"> • Wildlife protection, including threatened woodland caribou • Fisheries, especially lake trout • Commercial tourism, including canoeing and ecotourism • Crown Land recreation <p>Area 1) Proposed road building and logging in the area of Boiling Sand River and Tamarack Lake up to the edge of Wabakimi PP – Trail Lake Road extension:</p> <ul style="list-style-type: none"> • Must maintain the existing low quality road to the Tamarack Lake area and beyond. • Harvesting must be only winter, if at all. Preferably deferred until the next plan (beyond 2033, when hopefully there will be a park management plan.) • Any and all access beyond Tamarack should be temporary: winter roads only, with no gravel, and be totally unusable by trucks or cars in summer. The important values there include: • Important year-round caribou habitat at the very bottom and limits of their range, in all seasons • Lake trout • Road access to the Boiling Sand River will cause significant damage to ecological and park values, particularly unless and until there is a park plan to manage and limit such access • Current and potential ecotourism values, including remote fly-in canoe outfitting benefits to local outfitters and economy <p>Area 2) Proposed road building and logging in the D'Alton Road area between the D'Alton Block and the north end of Caribou Lake:</p> <p>Critical values to be protected there are :</p> <ul style="list-style-type: none"> • Caribou calving on Caribou Lake. Predator access will be enhanced by any road access nearby. All disturbance must be minimized. • Caribou migration routes • Caribou Lake is an important lake trout lake • The north end of Caribou Lake is already the most important non-airplane access point for canoeists (both customers of commercial tourism and general canoeing public) into Wabakimi that will only increase in use and importance. It must remain semi-remote, as it is now! The proposed secondary road extension is unacceptable. There should be no roads with gravel beyond the current point, any access and logging in this plan should be very temporary, and winter only. <p>Area 3) The Kellar Road, right at the top of Caribou Lake, near critical caribou calving and walleye spawning beds:</p> <p>All the reasons stated for the D'Alton Road also apply</p>	Mitchell Legros 06/23/2022	See comment 23 for templated summary of reply

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2023-2033 FMP Stage 3	52	41	03/11/2022	I am in agreement with (Party # 10) in regards to protecting the areas around Wabakimi Park. I believe it is important that these areas only have temporary and/or limited access. Limiting usage and human contact ensures the native species remain as natural and unspoiled as possible. Once that is lost, it can never be reclaimed.	Mitchell Legros 05/27/2022	See comment 23 for templated summary of reply

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Respondent	PT Response
2023-2033 FMP Stage 3	53	42	03/13/2022	<p>I am writing to learn a little bit about what's happening with potential road development near Wabakimi. I am also wondering if you can share with me what companies are wanting to build these roads and what their intentions are, not just for the near sighted project, but long term projects. I am certain what ever current plans are, they are associated with long term objectives, what are those?</p> <p>Who owns these companies, are they locals, or from out of Province/Country with no personal vested interest in the well being of the forest in that area? Just curious.</p> <p>I really don't know the answers, but I would like to learn more about the project and how it proposes to protect the intent of Wabakimi being a wilderness park? Is there any conflicts with the proposed use and the following interests of Wabakimi area?</p> <ul style="list-style-type: none"> • Wildlife protection, including threatened woodland caribou. • Fisheries, especially lake trout. • Commercial tourism, including canoeing and ecotourism. • Crown Land recreation. <p>What are those conflicts? As an outdoor enthusiast, I always wonder, is there a reason that existing resources can't be used or managed better, so that we can protect and avoid untouched areas, and protect the limited resources from going down the path of no return?</p>	Jeff Cameron 04/27/2022	<p>Based on natural disturbance patterns, the FMP guides the location and amount of harvesting that may occur, where the roads will be built and how much forest is renewed. FMP's take approximately 3 years to prepare and once approved by the ministry, all forestry activities on the forest must follow the approved FMP.</p> <p>The 2023-2033 Wabadowgang Noopming FMP,</p> <ul style="list-style-type: none"> • is prepared for the 10-year period or 2023-2033 • follows the Forest Management Planning Manual (FMPM, 2020) • determines how much/where harvesting can occur, where roads can be built and how much forest will be renewed • must ensure sustainability while finding a balance of social, economic and environmental values • includes opportunities for public involvement <p>The road use management strategies for Tamarack Lake Road and the Trail Lake Road are currently being discussed by the Planning Team in response to stakeholder feedback received through public consultation. For the Tamarack Rd and operational roads located within harvest area, the intent of the Planning Team is to develop a Road Use Management Strategy that includes decommissioning activities focused on maintaining the capable caribou habitat of the area. Discussions regarding the decommissioning strategy for Trail Lake Road are ongoing, and the Planning Team is working with affected stakeholders and may consider shortening the primary Trail Lake Road corridor to the intersection with the proposed Fawn Road corridor.</p> <p>The 2023-2033 Wabadowgang Noopming FMP has a total of 9 management objectives, with 32 indicators. The FMP objectives are identified in Table FMP-10, along with the indicators that are used to measure objective achievement. The FMP objectives are:</p> <ul style="list-style-type: none"> • Forest Diversity and Provision of Forest Cover: Habitat for forest-related species and species at risk in Ontario. • Forest Diversity: To emulate natural landscape patterns. To provide forest structure, composition and abundance that is representative of natural landscape composition over time. • Social and Economic: Long term harvest levels. • Social and Economic: Planned Harvest levels, community well-being. • Social and Economic: Harvest Levels, community well-being. • Silviculture: to maintain and enhance the forest ecosystem condition and productivity through silviculture practice. • Ecological Sustainability: To ensure a healthy forest ecosystem and protection of the natural resource and non-forest values through the development of a forest management plan. • Social and Economic: Involvement in forest management plan development and implementation. • Social and Economic: To improve the responsible usage of herbicides on the forest. <p>Wildlife protection, including threatened woodland caribou With the implementation of the forest management guides during planning (i.e., Stand and Site Guide - SSG and Boreal Landscape Guide - BLG) coarse and fine filter approaches to wildlife habitat management are taken. Targets are set based on natural ranges of forest landscape classes (coarse filter), forest composition, structure</p>

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						<p>and pattern at the landscape level that create a diversity of ecosystem conditions that provide the habitat requirements for a range of wildlife species. A fine filter may be required if the ecological requirements of a particular species are not addressed sufficiently through the application of just the coarse filter or if social/economic aspects of sustainable development require more or less habitat than would be provided by nature. Both the BLG and SSG provide direction and guidance on the application of these filters during FMP planning.</p> <p>Maintaining caribou habitat over the long term is a major consideration in the development of the FMP. The entire Wabadowgang Noopming Forest is within the continuous caribou distribution zone. The forest management plan supports the priorities in the Caribou Conservation Plan. One example of caribou habitat protection at the site level is the Area of Concern (AOC) prescription for woodland caribou calving and nursery lakes (AOC ID "CAR- 1"). T Fisheries - Lake trout</p> <p>The Wabadowgang Noopming Forest will include Area of Concern (AOC) prescriptions that follow this direction. Hollingsworth Lake, Howie Lake and Caribou Lake are designated Lake Trout lakes and will have a 1.6km Lake Trout AOC (LT) – 120m no harvest reserve with a 1.6km temporary road zone. This prescription provides extra protection beyond what is required for other lakes and streams.</p> <p>Commercial tourism, including canoeing and ecotourism The FMP will have consideration for commercial tourism and recreation values. The Planning Team has developed AOC prescriptions for the FMP to protect tourism values including canoeing and ecotourism.</p>

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2023-2033 FMP Stage 3	54	43	03/11/2022	<p>Wabakimi is one of the most pristine wilderness areas I have ever experienced and want to continue. After 20 years of traveling in the Boundary Waters and Quetico, the over use resulting in deterioration of the portages and campsites was to much.</p> <p>I now travel to Wabakimi from Chicago with friends and family each year. Please protect it from the abuse by humans, Including irresponsible canoeists and campers.</p> <p>Please let me know if I can help in protecting Wabakimi.</p>	<p>Mitchell Legros 06/23/2022</p>	<p>In your email dated March 11th, 2022, to the plan author Jeffrey Cameron, you indicated that you wanted to ensure the appropriate protections are in place for the park as well as indicating if there was any other way you could help.</p> <p>By participating in the planning process for the 2023-2033 forest management your comment will be taken into consideration as a part of the planning process. The public input received during the plans consultation process inevitably helps shape and develop a forest management plan that strives to best balance the social economic and environmental objectives for the plan.</p> <p>See comment 23 for templated summary of reply</p>
2023-2033 FMP Stage 3	55	44	03/12/2022	<p>Email requesting additional time for full review to be completed so a full comment can be submitted was requested by stakeholder.</p>	<p>Mitchell Legros and Jeff Cameron 03/15/2022</p>	<p>Email requesting additional time for full review to be completed so a full comment can be submitted was requested by stakeholder.</p>

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2023-2033 FMP Stage 3	55	44	03/13/2022	<p>2.0 The Overall Plan</p> <ul style="list-style-type: none"> - documentation provided meets normal industrial practises, and follows standard process. - only considered the needed Road construction as a necessary evil, and have focused largely on the cuts proximal to Caribou Lake. Those proximal cuts are all clearly critical caribou habitat. <p>Also reviewed Caribou Range Reports for Brightsand and Nipigon. Those reports clearly support that Forestry Operations continue to drive the Caribou north, and that these populations are at varying risk of extirpation.</p> <ul style="list-style-type: none"> - I found no scientific Evidence that DCHS has any basis in Science. At best, it is adaptive management and founded largely or Policy, and politics (not Science). - I am acceptant that something is being done to manage this Forested Landscape, but I would tend to favour the Federal approach to managing the very complex National issue of caribou management. <p>3.0 Specifics</p> <p>I find the Plan deficient in the presentation of any mapping of winter and summer range usage by the exciting caribou, and the usage of Caribou Lake as a "calving area" is almost no more than that exact wording.</p> <p>That said, I also understand that MNRF sees their Values Mapping as not part of the Public Record, but seems to freely provide the same to FN. That is clearly abuse of Public Trust, and makes for bad Governance. In my Professional opinion, the risk to these isolated groupings of caribou are as follows, in rank order:</p> <ol style="list-style-type: none"> 1. The next to permanent nature of the main haulage roads 2. Increased wolf predation due to those roads; 3. Increased FN exploitation of this, and other game; and 4. The on-going forestry operations (i.e. cutting and re-generation) 5. The Anthropogenic Climate Crisis. <p>3.1 Mitigate Measures</p> <p>4.0 Monitoring</p> <p>What MNRF is doing (and has been doing since they were the Department of Lands and Forests) has little hope of ever working, and yet is cast on stone tablets in Peterborough. Future monitoring efforts need to adopt – Drones, as well as GPS radio collars.</p> <p>Given the micro-scale nature of the required biological required monitoring, hand-held GPS are in- adequate and RTK-enabled GPS needs to be adopted as standard practise.</p>	Mitchell Legros 03/15/2022	<p>In your email dated March 18th, 2022, to the plan author Jeffrey Cameron, you indicated you had specific concerns regarding the following:</p> <ol style="list-style-type: none"> 1. The next to permanent nature of the main haulage roads 2. Increased wolf predation due to those roads; 3. Increased FN exploitation of this, and other game; and 4. The on-going forestry operations (i.e. cutting and re-generation) 5. The Anthropogenic Climate Crisis. <p>1. The next to permanent nature of the main haulage roads</p> <p>Thank you for recognizing the planning team's efforts regarding road decommissioning strategies as acceptable. The forest management plan makes a sustainable amount of wood available factors outside the influence of the planning process will dictate whether that would that is made available as utilized. Your recommendation to gate all main roads is not a viable option. However, the planning team has discussed specific locations on primary access or branch access where a gate may be beneficial.</p> <ol style="list-style-type: none"> 2. Increased wolf predation due to those roads; <p>Wildlife populations and the regulation of them is outside the scope of the planning process. Things we can do to mitigate predator effectiveness would be aggressive road decommissioning strategies where we functionally render the road indistinguishable from the surrounding cut block.</p> <ol style="list-style-type: none"> 3. Increased First Nation exploitation of this, and other game; 4. The on-going forestry operations (i.e. cutting and re-generation) <p>In progress</p> <ol style="list-style-type: none"> 5. The Anthropogenic Climate Crisis. <p>At a management unit level, sustainable forest management that maintains or increases forest carbon stocks and produces an annual sustained yield of timber, fibre, or energy from the forest, provides the largest sustained mitigation of climate change, while also providing many social and environmental benefits. The Landscape Guide directs sustainable forest management to maintain a natural range of tree species mixes, ages, and patch sizes with an assumption that this variation will enable forest ecosystems to be resilient (i.e. having the capacity to adapt) to changes in temperature and precipitation. Following landscape direction to manage a forest's age and tree species composition within a range of natural variation will maintain the above ground forest's carbon balance within an expected range of natural variation. As stated above the Landscape Guide must be reviewed every five years and revised when appropriate to reflect new knowledge and experience. As our understanding and predictions about climate change improve, policy options that more actively respond to climate change may be incorporated into future versions of the Landscape Guide to address its effects more directly. Monitoring values is something that is outside the scope of the forest management plans consultation process.</p>

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				<p>The development of a field, photo key for lichens and mosses would be beneficial. There is also a need for one full Time (and one seasonal) biologist working on this specific FMP, and to train them and get them out into the Field approximately 50% of their Time. It is my personnel position that the Forestry Sector should be Funding that independent of the Government, and issuing annual process reports</p>		

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Response	PT Response
2023-2033 FMP Stage 3	56		03/13/2022	<p>Support for the McKinley Road Primary Access Option. - I want to commend the Planning Team and the Steering Committee for endorsing the McKinlay Road option (option 6) as the preferred primary access route to the northern and northwestern portion of the Management Unit. - I am asking that this preferred alternative is accepted as the chosen route reflected in the FMP. I argue that the preferred alternative avoids the irreversible harm that would have been inflicted by the other alternatives.</p> <p>Suggested Improvements to the Text Around Road Management.</p> <p>We request that the Ministry write some text into the preamble of the RUMS section of the FMP to reflect a desire to remove effective linear features following operations to the extent possible and consider setting a target of say 80 – 90 percent of operational roads be both decommissioned and rehabilitated / re-vegetated. Proposed new wording in section 4.5.5.1.</p> <p>Where intensive, aggressive or moderate levels of road decommissioning / rehabilitation is proposed, and caribou habitat quality is an objective, road decommissioning will focus on reducing or removing the advantages that roads and linear features provide to predator hunting efficiency in the short term and eventually return the roadbed to mature, productive forest suitable for potential caribou refuge habitat. Restricting human access is a secondary objective to minimize damage to regenerating conifer trees where necessary and reducing potential anthropogenic disturbance from motorized traffic (e.g., trucks, snowmachines and ATVs and accidental mortality from hunters). Linear features and the land through which they traverse can be highly variable in terms of substrate, moisture, existing vegetation, spatial extent and location within a network of features. No single treatment is appropriate for all situations. A reasonable way of considering road and linear feature restoration would be to have the objective to renew and rehabilitate the former road such that it is functionally indistinguishable from the adjacent forest. Functionally indistinguishable means:</p> <ul style="list-style-type: none"> • The former road does not provide an energetics or hunting advantage to predators; • The former road does not produce a preferential density or selection of forage for alternate prey that could in turn affect the distribution of predators; and • The former road does not produce a preferential direct seasonal food supply (i.e., early herbaceous growth, blueberries, chokecherries, pin cherries, raspberries, hazel nuts etc.) for predators such as black bears. A desirable 	N/A	No reply requested stakeholder is working with planning team. Comment was provided to be taken into consideration for Draft Plan

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				<p>outcome is to make the areas associated with the decommissioned road or linear feature functionally indistinguishable from the adjacent forest stand conditions. Being functionally indistinguishable in terms of predator efficiency would require vegetative or physical structural complexity that would equal or exceed that within the surrounding forest and stand conditions, and not necessarily by just attempting to match species composition or tree growth rates. Such a definition also suggests a measurement benchmark related to structural complexity and a monitoring benchmark related to soft mast production and human and predator movement relative to the surrounding terrain.</p> <p>\ Proposed new Wording for Table FMP-18 Suggested Alt wording DS1. Intensive/aggressive approach to road decommissioning/rehabilitation within areas with no previous harvest history and access is no longer needed (i.e. no branch or primary roads traveling through the area to access future harvest allocations). These areas are defined as capable of providing high quality caribou habitat. Objective is to reduce predator efficiency, alternate prey forage availability, and promote forest structure and composition consistent with adjacent forest conditions. Focus may be for Primary, Branch and/or Operational roads. Suggested Alt wording DS2. Moderate level of road decommissioning/rehabilitation within areas where through access (via primary or branch road) is still needed to access future allocations. Given appropriate silviculture treatments, these areas are defined as capable of providing suitable caribou habitat. Objective is to reduce predator efficiency, and alternate prey forage availability, and reduce human use that would maintain linear features. Generally focused on branch and operational roads. Suggested Alt wording DS3. Low to moderate levels of road decommissioning/rehabilitation. This includes areas that are already highly accessed and well-used for recreational activities or non-timber road-based activities. This involves a combination of active decommissioning while leaving some roads open to the public. Objective within caribou range is to minimize loss of productive forest land and maximize the forest renewal consistent with adjacent silvicultural objectives where possible.</p>		

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2023-2033 FMP Stage 4	57	45	08/24/2022	Could you please verify for me if "LCC member" and company are trying to include Caribou Lake into the park ? This was brought up before when the expansion took place in the 90's. It was voted down then and my family and other property owner's on Caribou Lake were against it before and my family still is against it. Who appointed "LCC rep" to be the spokesperson for us. To my knowledge the property owners and community members have not been notified of this demand from LCC rep and associates. Please verify this rumor if it is one.	Mitchell Legros 09/08/2022	As a part of the public consultation process for a Forest Management Plan (FMP) we cannot disclose the identity of individuals who comment on the FMP. However in the summary of public consultation, page 233 of the supplementary documentation from the FMP, we identify our response to a stakeholder group that requested the addition of more protected areas (parks and conservation reserves). In our reply we identified that reclassifying these areas is outside the scope of the FMP process. A local LCC rep is the local citizens committee representative for the Wabadowgang Noopming Forest Planning Team. The Planning Team is the decision making entity for the FMP and has no authority for the establishment of protected areas. The authority to create protected areas lies with the Ministry of the Environment, Conservation and Parks (MECP).
2023-2033 FMP Stage 4	58	64	09/26/2022	Would like to see the access restriction at Michelle lake on the Dalton Road be removed.	10/27/2022	Planning team was unable to come to consensus an the Request was elevated to issue resolution meeting with the regional director see summary of issue resolution for details.

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Respondent	PT Response
2023-2033 FMP Stage 4	59	2	07/31/2022	<p>Crown Land Use Policy Atlas (CLUPA)* The policies of CLUPA 2616 covers the WNF north of the Big River. "Road access will be managed to maintain commercial tourism and fish and wildlife habitat. Operating and annual plans will contain specific guidelines for the protection of tourism values and fish and wildlife habitat." We understand that forest management and logging are allowed in CLUPA 2616. We appreciate the effort that has gone into using the McKinley Road to access Block AB-3 to avoid building a road between Caribou Lake and D'Alton Lake. We note the effort to prevent road access to the Michell Lake and creation of buffers to insulate historic canoe routes. We also note the effort to decommission secondary roads once they are abandoned. We also note that even though the Big Lake Road is signed "Road closed to unauthorized vehicles. Access prohibited under PLA. It appears that the intent is allow access according to the quote on page 179. "This gate is currently open, and the intent is to keep it open." We assume this means that recreational paddlers can still use the Big Lake Road to access the Big Lake and the Big River. The McKinley Road is also signed with a similar sign which most paddlers find confusing. This road could provide an exit point for a trip down the Big River or provide access to the Gort Lake and the Pikitguish River. Hopefully this road can continue to provide access to both of these canoe routes. As noted, the FOW encourages limited access to historical canoe routes. *Please note that on page 73 of the Management Plan it appears that CLUPA 2616 has been mislabeled as CLUPA 2619. Species at Risk CLUPA 2616 does focus attention on maintaining fish and wildlife habitat. Page 198 of the draft Forest Management Plan notes that "known nests will not be destroyed". Page 47 provides a list of birds identified as Species at Risk. This list includes: Canada Warbler, Olive Sided Flycatcher, Common Nighthawk and the Bald Eagle. All of these bird species and many more have been identified along Big River canoe route which includes the Reef Lake Peninsula. Evidence of caribou was also found along the Big River. The attached memo, Reef Lake Peninsula Harvest Area, provides details and supporting documentation. As a result of this documentation, the following motion was approved by the Board of Directors of the Friends</p>	Mitchell Legros 10/27/2022	<p><u>Crown Land Use Policy Atlas (CLUPA)</u> Thank you for recognizing the planning team's efforts to adhere to crown land use policy atlas entry 2616. In your comment you mention the sign on Big Lake and McKinley Roads says "Road closed to unauthorized vehicles. Access prohibited under PLA" although the gate is intended to remain open the sign would prohibit any member of the public from traveling past the sign. Members of the public found past these signs could be charged under the public lands act. Please note these signs and the restrictions imposed by them our product of negotiations with local stakeholders in the past and are outside the scope of the Forest Management Planning process. The sole delegation of authority with public lands act restrictions rests with the Ministry of Natural Resources and Forestry's District Manager not the Planning Team. Thank you for pointing out the mistake on page 73 this will be corrected for final plan submission.</p> <p><u>Species at Risk</u> Thank you for providing the planning team information about species at risk. In Forest Management Planning, protection and protection consideration is given when there is a known potentially sensitive value associated with an area or species, for example, bird nests or den sites or stream shorelines would receive an area of concern prescription. Identifying the presence of specific birds (eastern whippoorwill <i>Antrostomus vociferus</i>) in combination with a known nest site can also receive an area of concern prescription. However, any value must be validated by the MNRF District prior to it being incorporated into the provincial values layer that receives consideration and/or protection in Forest Management Planning.</p> <p>Upon review of the associated document there only appears to be 1 specific value (eagle "stick nest" which was observed on the south side of Shoal Lake) that can be verified by the MNRF and potentially receive an area of concern prescription.</p> <p>The planning team is not of the opinion that the Reef Lake area requires additional protection beyond what is already afforded by our forest management guides and manuals</p> <p>Where specific known habitat features or values have been identified, MNRF and the Planning Team have developed and/or applied Area of Concern prescriptions to be applied during forestry operations to assist with the protection of those values or features against potential adverse effects.</p> <p>The reef lake area was given addition protection beyond approved guidelines through an AOC negotiated with tourism operators in the area. The intent of the AOC is to maintain the sense of wilderness in the area. Herbicides & Rocky Road -In the Silvicultural Ground Rules, Herbicide is listed as an alternative treatment (rather than most common treatment).</p>

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				<p>of Wabakimi at their June 26, 2022 meeting. "To maintain the habitat and the wilderness values of this potential conservation reserve, the Friends of Wabakimi strongly recommend that the Reef Lake Peninsula NOT be considered for logging."</p> <p>Herbicides & Rocky Road</p> <p>In the Summary of the Wabadowgang Noopming 2033-2033 Forest Management Plan on page 10, herbicide use was identified as a major issue. At this time it is unclear as to whether herbicide use would be acceptable to all stakeholders particularly in the areas that the Rocky Road would make accessible. If herbicides are not acceptable and cannot be used as silviculture strategy to regenerate the forest after the cut, will this block still be logged? If not, will the Rocky Road still be needed?</p>		<p>-Stand conversion (Hardwood to Conifer dominant) normally results in multiple herbicide applications on the same stand. Therefore, stand conversion from (hardwood to pure conifer) is not permitted under the 2023-2033 FMP.</p> <p>-As per the steering committee direction, the planning team developed a FMP objective to improve the responsible usage of herbicide on the Wabadowgang Noopming Forest. Objective 9 is shown in Table FMP-10.</p>

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2023-2033 FMP Stage 4	60	46	09/12/2022	Please protect the woodland caribou in central Ontario! It is my favorite place to canoe and vacation. Rocky Road should not be built in this decade during this planning period, and there should be no logging, during the 2023-2033 FMP (Forest Management Plan) period. Potentially, a better roads plan could and should be deferred until the next planning period (2033-2043).	Mitchell Legros 10/27/2022	<p>The Planning Team understands your concerns and has heard similar expressed by others. There are numerous Area of Concern (AOC) prescriptions overlapping this area that are designed to protect the known values and features that exist. At this time, there are no known and/or delineated caribou nursery areas in this geography that would otherwise also be afforded protection through a caribou nursery area timing AOC prescription. The Planning Team believes that the correct AOC prescriptions are in place to represent and thereby protect the known values of this area.</p> <p>Completion of harvest in the Rocky Road location will result in the development of a more even-aged forest condition. The presence of large and contiguous tracts of even-aged coniferous forest are ultimately what is needed to enable caribou to persist on the landscape over the long-term. In the screengrab [provided in reply], the highlighted white line shows the previous road that was used to harvest part of the area in the Rocky Road location. The location of the branch Road corridor known as Rocky Road in this upcoming FMP will plan to utilize as much of the previously existing road as possible before accessing the far east unharvested portion. Further south of this location there is also previous harvest in the Collins Lake Area. By completing harvest in this area in the upcoming FMP, we will be creating a large landscape patch which will consist of forest that ranges from 1-15 years old and which will resemble the type of disturbance that a stand-replacing wildfire would naturally, in terms of forest structure and composition. Our forest management policy directs us to emulate the effects that wildfire has on the landscape during forest management and operations.</p> <p>For these reasons, among others, the Planning Team believes that the completion of harvest in this area for this 10-year FMP best balances all the social, economic, and environmental objectives for the FMP.</p>

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2023-2033 FMP Stage 4	61	47	09/12/2022	Please protect the Wood Land Caribou and make that your highest priority as you consider Rocky Road, Hollingsworth South Road and D'Alton Road.	Mitchell Legros 10/27/2022	<p>The Planning Team understands your concerns and has heard similar expressed by others. There are numerous Area of Concern (AOC) prescriptions overlapping this area that are designed to protect the known values and features that exist. The Planning Team has structured its reply based on the roads you inquired about.</p> <p><u>Rocky Road (Branch Road Corridor)</u></p> <p>At this time, there are no known and/or delineated caribou nursery areas in this geography that would otherwise also be afforded protection through a caribou nursery area timing AOC prescription. The Planning Team believes that the correct AOC prescriptions are in place to represent and thereby protect the known values of this area.</p> <p>Completion of harvest in the Rocky Road location will result in the development of a more even-aged forest condition. The presence of large and contiguous tracts of even-aged coniferous forest are ultimately what is needed to enable caribou to persist on the landscape over the long-term.</p> <p>In the screengrab that I provided, the highlighted white line shows the previous road that was used to harvest part of the area in the Rocky Road location. The location of the branch Road corridor known as Rocky Road in this upcoming FMP will plan to utilize as much of the previously existing road as possible before accessing the far east unharvested portion.</p> <p>Further south of this location there is also previous harvest in the Collins Lake Area. By completing harvest in this area in the upcoming FMP, we will be creating a large landscape patch which will consist of forest that ranges from 1-15 years old and which will resemble the type of disturbance that a stand-replacing wildfire would naturally, in terms of forest structure and composition. Our forest management policy directs us to emulate the effects that wildfire has on the landscape during forest management and operations.</p> <p>For these reasons, among others, the Planning Team believes that the completion of harvest in this area for this 10-year FMP best balances all the social, economic, and environmental objectives for the FMP.</p> <p><u>Hollingsworth South Road (Primary Road Corridor)</u></p> <p>For this Draft FMP, the Hollingsworth South Road is identified as an Alternative Primary Road corridor to the Hollingsworth Road. This means that unless there is compelling public feedback received at this stage of planning (none received to date), the Hollingsworth Road (North option on screen grab below) will be the approved corridor in the upcoming FMP.</p> <p><u>D'Alton Road (Primary Road Corridor)</u></p>

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						<p>Similar to the Hollingsworth South Road, the D'Alton road is an Alternative Primary Road corridor. This means that unless there is compelling public feedback received at this stage of planning (none received to date), the McKinley Road (east option on screen grab provided) will be the approved corridor in the upcoming FMP.</p> <p>In summary, Forest Management Plan objectives related to woodland caribou are very important and were considered by the Planning Team.</p> <p>The Planning Team understands your concerns and has heard similar expressed by others. There are numerous Area of Concern (AOC) prescriptions overlapping this area that are designed to protect the known values and features that exist. The Planning Team has structured its reply based on the roads you inquired about.</p> <p><u>Rocky Road (Branch Road Corridor)</u></p> <p>At this time, there are no known and/or delineated caribou nursery areas in this geography that would otherwise also be afforded protection through a caribou nursery area timing AOC prescription. The Planning Team believes that the correct AOC prescriptions are in place to represent and thereby protect the known values of this area.</p> <p>Completion of harvest in the Rocky Road location will result in the development of a more even-aged forest condition. The presence of large and contiguous tracts of even-aged coniferous forest are ultimately what is needed to enable caribou to persist on the landscape over the long-term.</p> <p>In the screengrab [provided in reply], the highlighted white line shows the previous road that was used to harvest part of the area in the Rocky Road location. The location of the branch Road corridor known as Rocky Road in this upcoming FMP will plan to utilize as much of the previously existing road as possible before accessing the far east unharvested portion.</p> <p>Further south of this location there is also previous harvest in the Collins Lake Area. By completing harvest in this area in the upcoming FMP, we will be creating a large landscape patch which will consist of forest that ranges from 1-15 years old and which will resemble the type of disturbance that a stand-replacing wildfire would naturally, in terms of forest structure and composition. Our forest management policy directs us to emulate the effects that wildfire has on the landscape during forest management and operations.</p> <p>For these reasons, among others, the Planning Team believes that the completion of harvest in this area for this 10-year FMP best balances all the social, economic, and environmental objectives for the FMP.</p>

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Respondent	PT Response
						<p>Hollingsworth South Road (Primary Road Corridor)</p> <p>For this Draft FMP, the Hollingsworth South Road is identified as an Alternative Primary Road corridor to the Hollingsworth Road. This means that unless there is compelling public feedback received at this stage of planning (none received to date), the Hollingsworth Road (North option on screen grab [provided in reply]) will be the approved corridor in the upcoming FMP.</p> <p><u>D'Alton Road (Primary Road Corridor)</u></p> <p>Similar to the Hollingsworth South Road, the D'Alton road is an Alternative Primary Road corridor. This means that unless there is compelling public feedback received at this stage of planning (none received to date), the McKinley Road (east option on screen grab below) will be the approved corridor in the upcoming FMP.</p> <p>In summary, Forest Management Plan objectives related to woodland caribou are very important and were considered by the Planning Team.</p> <p>Upon further review of your comments the Planning Team felt it necessary to identify two other potential roads in the South Hollingsworth Road area and the D'Alton Road area. The Branch Road corridor that overlaps the South Hollingsworth option is known as Kellar Road (zoomed in version [provided in reply]). The Kellar branch road corridor will extend from the existing Hollingsworth Road (top right of image [provided in reply]) and reach its terminus just south of Howie lake. The Planning Team determined that the current suite of area of concern prescriptions (see summary at the end of this section) in place for draft plan adequately balances the ecologic, social and economic objectives for this Forest Management Plan. The Branch Road corridor that overlaps the D'Alton primary road alternative is known as D'Alton Road (zoomed in version [provided in reply]). The D'Alton Branch Road corridor is currently in the approved Contingency plan and the road is partially constructed. The Planning Team noted that this area is subject to area of concern prescriptions that protect caribou calving areas and tourism values. The Planning Team determined that the current suite of road use management strategies and area of concern prescriptions in place for draft plan adequately balances the ecologic, social and economic objectives for this Forest Management Plan.</p> <p><u>Summary of Protections in the Forest Management Plan</u></p> <p>Road Use Management Strategy</p> <p>After harvesting and silviculture activities are completed in the area, the intent is to decommission this road with an aggressive strategy that, to the extent reasonably possible, will promote forest structure</p>

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						<p>and composition consistent with adjacent forest conditions, by minimizing linear features and regenerating forest stands as appropriate for the site conditions and silvicultural ground rules.</p> <p>Walleye Spawning areas</p> <p>Previous consultation opportunities with stakeholders have identified potential for a walleye spawning area close to this location however currently there is no verified value in the MNR's database. If you have any observations such as a georeferenced picture (example one taken from a Smart Phone with locational services enabled) could you please provide it to the MNR district biologist? This will assist with the verification of the value an application of an area of concern prescription.</p> <p>Caribou and Hollingsworth Lake Protections</p> <p>The Forest Management Plan includes AOC prescriptions for tourism and lake trout values at Caribou Lake (AOC "CARI-TR") and Hollingsworth Lake (AOC "HOLL-CL"). The prescription at Caribou Lake provides a 750m plus variable width reserve, along with a seasonal (October 1 to April 30) operations zone (750-1000m) and temporary road zone (1000-1600m) around the lake. The prescription at Hollingsworth Lake provides a 1000m reserve, plus a temporary road zone (1000-1600m) around the lake. These protections are in addition to the CAR-1 nursery area, area of concern prescription which provides a no-harvest reserve as mapped, and a 1000m modified operations zone which restricts harvest during the calving period, from May 1st to August 15th.</p> <p>Caribou and Lake Trout Protections</p> <p>The Forest Management Plan is required to follow the manuals and guides which includes protection measures for woodland Caribou. Maintaining caribou habitat over the long term is a major consideration in the development of the Forest Management Plan. The entire Wabadowgang Noopming Forest is within the continuous caribou distribution zone and for this reason, the Forest Management Plan follows the direction in the Boreal Landscape Guide [Link to Boreal Landscape Guide provided in reply] and supports the priorities in the Caribou Conservation Plan. An example of caribou habitat protection at the site level is the AOC prescription for woodland caribou calving and nursery lakes (AOC ID "CAR-1"). This prescription will protect caribou values during Forest Management Plan implementation through the application of a mapped no-harvest reserve, and restrictions (1km buffer from the reserve) on the timing of forest activities during the calving season. Caribou Lake will have the CAR-1 AOC prescription applied to protect caribou calving values in that area.</p>

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2023-2033 FMP Stage 4	62	48	09/12/2022	<p>My comments, on the 2023 – 2033 Draft Forest Management Plan (FMP) for the Wabadowgang Noopming Forest, are that this forest is far to important to sensitive Boreal Woodland Caribou to be considering this. The Wabadowgang Noopming Forest is currently the most southern location known to have these caribou. This has only been made possible by adding protection to the animal with the expansion of Wabakimi provincial park. The Woodland Caribou is an iconic Canadian species, that today, find its self on the list of threatened under the federal species at risk act. They were once found in 80% of the country. Today, their numbers are dropping dramatically, at least half of the caribou's range has been lost due to activities that disturb and fragment their forest habitat, such as road building. Although elusive and seldom seen, these animals and their habitat are worthy of the highest respect.</p> <p>“Caribou are barometers for healthy forests. If caribou aren't doing well, that means our forests are in trouble and we need healthy forests to help sequester carbon, regulate climate, and mitigate against floods, to name a few of the ecological services that they provide.” — David Suzuki</p> <p>thank you for your time</p>	Mitchell Legros 10/27/2022	<p>The Planning Team understands your concerns and has heard similar expressed by others.</p> <p>When developing a Forest Management Plan in the boreal forest region, Planning Teams must ensure that the policy direction for protecting woodland caribou habitat outlined in the Forest Management Guide for Boreal Landscapes is followed (note this guide is commonly referred to as the Boreal Landscape Guide or BLG) [Link to BLG provided in reply]. Within the BLG, there is direction that is based on the best available science for Planning Teams to ensure there is a sufficient amount of current and future habitat for caribou. This is done by planning harvest in a manner that would provide forest composition and structure similar to what would be found in a natural disturbance-driven forest. When developing a Forest Management Plan, planning teams are required to measure forest composition and structural (habitat) indicators through a 160-year horizon (Page 28 of the BLG). This long-term planning is known as the Long-Term Management Direction (LTMD). When measuring the compositional indicators planning teams strive to move the indicators towards or maintain within the simulated range of natural variation (otherwise known as the amount of that indicator that would be present on the forest in a natural forested state driven by wildfire). By applying this direction, which is based on the best available science, as well as harvesting in a manner that is consistent with the LTMD projections, the Planning Team should in theory be providing a sustainable amount of habitat for caribou for the 10-year Forest Management Plan.</p> <p>Where there are known and verified caribou calving/nursery areas on the Forest, the Planning Team will apply an appropriate Area of Concern (AOC) prescription to this value. This AOC prescription provides a timing restriction from May 1st to August 15th during a time when moderate to high-impact forest operation activities may otherwise have the potential to disturb caribou activity in these sensitive areas. For your reference, I have attached the full AOC prescription for caribou nursery areas in the email.</p> <p>Additionally in your e-mail you indicated that the WNF was the furthest southern extent of woodland caribou. There are observations and values further south than Wabakimi. Though the values are kept in confidence, the general observations can be viewed via the following link: [Link provided to “Make a Map: Natural Heritage Areas” in reply]. [Provided in reply] is a screen grab of caribou Observations south of Wabakimi towards Highway 17.</p>

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Respondent	PT Response
2023-2033 FMP Stage 4	63	49	09/12/2022	Our party of four flew into Shawanabis Lake from Wabakimi Outfitters on August 21, 2022 and noticed a number of logging operations where roads were bulldozed and areas of trees cut down. We paddled a route From Shawanabis through Smooth Rock Lake, Boiling Sands River and ending at Tamarack Lake. We were disappointed at not seeing any caribou along the route that is in the general vicinity of the proposed Rocky Road. Certainly any more roads and logging will not keep caribou in the vicinity of Boiling Sands River and Tamarack Lake. I would hope that this note be included in your environmental assessment as evidence to the current population of caribou in the area.	Mitchell Legros 10/27/2022	<p>The Planning Team understands your concern and has provided some context below to help you understand the consideration that is given to woodland caribou when developing a Forest Management Plan.</p> <p>When developing a Forest Management Plan in the boreal forest region, Planning Teams must ensure that the policy direction for protecting woodland caribou habitat outlined in the Forest Management Guide for Boreal Landscapes is followed (note this guide is commonly referred to as the Boreal Landscape Guide or BLG) [Link to BLG provided in reply]. Within the BLG, there is direction that is based on the best available science for Planning Teams to ensure there is a sufficient amount of current and future habitat for caribou. This is done by planning harvest in a manner that would provide forest composition and structure similar to what would be found in a natural disturbance-driven forest. When developing a Forest Management Plan, planning teams are required to measure forest composition and structural (habitat) indicators through a 160-year horizon (Page 28 of the BLG). This long-term planning is known as the Long-Term Management Direction (LTMD). When measuring the compositional indicators planning teams strive to move the indicators towards or maintain within the simulated range of natural variation (otherwise known as the amount of that indicator that would be present on the forest in a natural forested state driven by wildfire). By applying this direction, which is based on the best available science, as well as harvesting in a manner that is consistent with the LTMD projections, the Planning Team should in theory be providing a sustainable amount of habitat for caribou for the 10-year Forest Management Plan.</p> <p>Unlike other species at risk such as wild ginseng, caribou are considered a landscape species having large home ranges that they move across on a regular basis. This means that every single observation of caribou or caribou sign cannot be considered a “value” in the true sense that one would consider an observation of a stationary wild ginseng plant.</p> <p>Where there are known and verified enduring features such as caribou calving/nursery areas on the Forest, the Planning Team will apply an appropriate Area of Concern (AOC) prescription to this value. This AOC prescription provides a timing restriction from May 1st to August 15th during a time when moderate to high-impact forest operation activities may otherwise have the potential to disturb caribou activity in these sensitive areas. For your reference, I have attached the full AOC prescription for caribou nursery areas in the e-mail.</p>
2023-2033 FMP Stage 4	64	N/A		I am writing out of concern for currently wild areas adjacent to Wabakimi Provincial park. I recently spent a week inside the park and was pleased to see widespread evidence of the Woodland Caribou. My understanding is that increased logging in road	N/A	

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Response	PT Response
				building could lead to degradation of the habitat of the caribou.		
2023-2033 FMP Stage 4	65	N/A		I am writing out of concern for currently wild areas adjacent to Wabakimi Provincial park. I recently spent a week inside the park and was pleased to see widespread evidence of the Woodland Caribou. My understanding is that increased logging in road building could lead to degradation of the habitat of the caribou.	N/A	
2023-2033 FMP Stage 4	66	50	09/12/2022	I am writing out of concern for currently wild areas adjacent to Wabakimi Provincial park. I recently spent a week inside the park and was pleased to see widespread evidence of the Woodland Caribou. My understanding is that increased logging in road building could lead to degradation of the habitat of the caribou.	Mitchell Legros 10/27/2022	<p>The Planning Team understands your concern and has provided some context below to help you understand the consideration that is given to woodland caribou when developing a Forest Management Plan.</p> <p>When developing a Forest Management Plan in the boreal forest region, Planning Teams must ensure that the policy direction for protecting woodland caribou habitat outlined in the Forest Management Guide for Boreal Landscapes is followed (note this guide is commonly referred to as the Boreal Landscape Guide or BLG) [Link provided to BLG in reply]. Within the BLG, there is direction that is based on the best available science for Planning Teams to ensure there is a sufficient amount of current and future habitat for caribou. This is done by planning harvest in a manner that would provide forest composition and structure similar to what would be found in a natural disturbance-driven forest. When developing a Forest Management Plan, planning teams are required to measure forest composition and structural (habitat) indicators through a 160-year horizon (Page 28 of the BLG). This long-term planning is known as the Long-Term Management Direction (LTMD). When measuring the compositional indicators planning teams strive to move the indicators towards or maintain within the simulated range of natural variation (otherwise known as the amount of that indicator that would be present on the forest in a natural forested state driven by wildfire). By applying this direction, which is based on the best available science, as well as harvesting in a manner that is consistent with the LTMD projections, the Planning Team should in theory be providing a sustainable amount of habitat for caribou for the 10-year Forest Management Plan.</p> <p>Unlike other species at risk such as wild ginseng, caribou are considered a landscape species having large home ranges that they move across on a regular basis. This means that every single observation of caribou or caribou sign cannot be considered a "value" in the true sense that one would consider an observation of a stationary wild ginseng plant.</p> <p>Where there are known and verified enduring features such as caribou calving/nursery areas on the Forest, the Planning Team will apply an appropriate Area of Concern (AOC) prescription to this value. This AOC prescription provides a timing restriction from May</p>

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Respondent	PT Response
						<p>1st to August 15th during a time when moderate to high-impact forest operation activities may otherwise have the potential to disturb caribou activity in these sensitive areas. For your reference, I have attached the full AOC prescription for caribou nursery areas in the e-mail.</p>

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Respondent	PT Response
2023-2033 FMP Stage 4	67	51	09/12/2022	I truly believe more roads and more logging in the area around Caribou Lake will not only disturb the Caribou in the area, but will also change the wilderness of the area. I have completed over 50 wilderness canoe trips throughout Ontario and have seen firsthand the changes created by roads into sensitive wilderness areas. I would strongly urge the Ministry and all other entities to not move forward with road building and logging closer to the park boundaries	Mitchell Legros 10/27/2022	<p>The Planning Team appreciates your concerns and has provided some context below for the consideration that is given to caribou and Wabakimi Provincial Park when developing an FMP.</p> <p><u>Woodland Caribou</u></p> <p>When developing an FMP in the boreal forest region, Planning Teams must ensure that the policy direction for protecting woodland caribou habitat outlined in the Forest Management Guide for Boreal Landscapes is followed (note this guide is commonly referred to as the Boreal Landscape Guide or BLG) [Link provided to BLG in reply]. Within the BLG, there is direction that is based on the best available science for Planning Teams to ensure there is a sufficient amount of current and future habitat for caribou. This is done by planning harvest in a manner that would provide forest composition and structure similar to what would be found in a natural disturbance-driven forest. When developing a Forest Management Plan, planning teams are required to measure forest composition and structural (habitat) indicators through a 160-year horizon (Page 28 of the BLG). This long-term planning is known as the Long-Term Management Direction (LTMD). When measuring the compositional indicators planning teams strive to move the indicators towards or maintain within the simulated range of natural variation (otherwise known as the amount of that indicator that would be present on the forest in a natural forested state driven by wildfire). By applying this direction, which is based on the best available science, as well as harvesting in a manner that is consistent with the LTMD projections, the Planning Team should in theory be providing a sustainable amount of habitat for caribou for the 10-year Forest Management Plan. Unlike other species at risk such as wild ginseng, caribou are considered a landscape species having large home ranges that they move across on a regular basis. This means that every single observation of caribou or caribou sign cannot be considered a “value” in the true sense that one would consider an observation of a stationary wild ginseng plant. Where there are known and verified enduring features such as caribou calving/nursery areas on the Forest, the Planning Team will apply an appropriate Area of Concern (AOC) prescription to this value. This AOC prescription provides a timing restriction from May 1st to August 15th during a time when moderate to high-impact forest operation activities may otherwise have the potential to disturb caribou activity in these sensitive areas. For your reference, I have attached the full AOC prescription for caribou nursery areas in the e-mail.</p> <p><u>Wabakimi Provincial Park</u></p> <p>To protect the boundaries of Wabakimi Provincial Park, the AOC prescription developed and provided by the Ministry of Environment Conservation and Parks (MECP) has been put in place to protect values associated with parks (full AOC has been attached in this</p>

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Respondent	PT Response
						<p>email for your review). In this FMP, roads close to Wabakimi Provincial Park have been identified as being in suitable or capable caribou habitat condition and thus are candidates for aggressive decommissioning strategies which are intended to leave the former road surface in a state commensurate with the silviculture efforts in the adjacent cut blocks.</p>

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2023-2033 FMP Stage 4	68	52	09/12/2022	<p>Mr. Jeff Cameron and Mr. Mitchell Legros,</p> <p>I got a chance to spend more than a week canoe camping with my friends and family at the pristine Wabakimi Park wilderness several weeks ago. Upon hearing about this proposed plan, I recall my group talked about the lack of caribou sighting while we were there. And we had some informative discussions with the Outfitter Operators and other Paddlers about it. And I share their same concerns.</p> <p>My concerns are especially related to harvesting and roads that are near or even right up to the eastern Wabakimi Park boundary. These roads are in a special provincial Land Use Zone (CLUPA #2616) in which conflicts between roads and logging are supposed to be settled in favour of special protection for Caribou and other wildlife and remote tourism. The concerns are especially:</p> <p>A) New roads and logging near the north end of Caribou Lake and Hollingsworth Lake, which are critically important caribou habitat. There are 2 roads that are problematic:</p> <p>1) Hollingsworth South Road proposed road that will squeeze through the tight spot between Caribou Lake and Hollingsworth Lake. Both these lakes are extremely important caribou calving areas. There is also an important walleye spawning bed, and Caribou Lake is also a prime lake trout lake. This road should either not be built at all, or at least be a very temporary winter road with only winter tree harvesting.</p> <p>2) The D'Alton Road will run in the very narrow spot between the north end of Caribou Lake (the same very important summer caribou calving on the islands) and a number of remote tourism outposts and canoe routes in the D'Alton Block that merit special protection. Once again it is my strong belief that roads in this area should be temporary, winter use and winter logging only.</p> <p>B) A proposed logging road (Rocky Road), with logging adjacent to Wabakimi Park in the area of Tamarack Lake. This area is also adjacent to the small but important Boiling Sand River. After 38 years, unbelievably there is no park management plan! Roads in this area will endanger important year-round caribou habitat just inside the park boundary around Tamarack Lake. These roads will also promote overuse of the river, campsites, fishery and fragile</p>	Mitchell Legros 10/27/2022	<p>The Planning Team has structured its reply similar to the format you submitted your comment.</p> <p>Crown Land Use Policy 2616</p> <p>CLUPA G2616 is a General Use Area that includes unique guidance and considerations for commercial tourism and fish and wildlife habitat. The specific land use intent is outlined below. LAND USE INTENT: The primary use for this area will be commercial tourism. Extractive activities such as timber harvesting, while growing in importance, will remain secondary. Road access will be managed to maintain commercial tourism and fish and wildlife habitat. Land use conflicts will be resolved recognizing the importance of commercial recreation in the area.</p> <p>As stated in the Guide for Crown Land Use Planning, Crown land use planning provides direction for a variety of resource planning and management processes such as Forest Management Planning. Land use planning determines where forest management can take place; Forest Management Planning, then, directs how forestry will take place on lands selected for this purpose, as indicated in the Management Guidelines for Forestry and Resource Based Tourism. The Policy Report for general use area G2616 clearly states that commercial timber harvest is permitted. The Land Use Intent then indicates the importance of tourism in the area and this direction becomes part of the consideration during the Forest Management Planning process. This process, which strives to balance social, economic, and environmental factors for a forest management unit to produce a Forest Management Plan that is sustainable for all parties involved, is required to consider the direction and intent in the CLUPA policy report. In addition, the Forest Management Plan is also required to consider the values and needs of other stakeholders on the forest.</p> <p>The Forest Management Plan cannot simply avoid these areas in perpetuity as the forest in parts of CLUPA 2616 have reached their biological rotation age, and in the absence of fire, will result in an overmature state of the forest which is well beyond what would be considered within the natural range of variation for the area. Within the FMP, Planning Teams are required to strategically plan harvest in a manner that would drive the forest to a "natural state". The intent of emulating the "natural state" through forest cover manipulation (harvesting) would be to provide the forest with a structure and composition that would be similar to that which would be found in a preindustrial state which on the Wabadowgang Noopming Forest would be a forest primarily disturbed by fire. This is one of the major factors influencing decisions to allocate harvest in CLUPA G2616. By prohibiting harvest, the PT is unable to emulate natural disturbance in this area which will result in excessive overmature forest being unnecessarily retained in this part of the Forest Deferring these areas within CLUPA 2616 is not an option for the planning team to consider – rather they must make allocation decisions in the Plan's Long-term</p>

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				<p>ecosystem with shallow soils. They will adversely effect the remoteness of the area, including the present 3 canoe outfitters (one is Indigenous), as well as future potential canoe trip guides and outfitters.</p> <p>My opinion, and the opinion of many concerned groups and citizens, is that Rocky Road should not be built in this decade during this planning period, and there should be no logging, during the 2023-2033 FMP (Forest Management Plan) period. Potentially, a better roads plan could and should be deferred until the next planning period (2033-2043). Jobs would not be lost, but some jobs in the Armstrong area would be postponed, or shifted to other areas on the unit.</p>		<p>Management Direction.</p> <p>Many of the areas in CLUPA 2616 have been logged in the past and were able to provide sufficient road decommissioning and area of concern prescription protections. These areas eventually fell into disrepair and were able to provide the current level of remoteness for Wabakimi provincial park. The primary road corridors or branch road corridors identified in this area will use mostly existing roads that were previously used to access past harvest areas close to Wabakimi provincial park.</p> <p>The planning team will use tools available to them to mitigate the impacts that logging could potentially have on the remoteness of this area. The planning team has been provided or will develop Area of Concern Prescriptions (AOC's) and road decommissioning strategies. An AOC is a specific constraint applied to forestry operations to protect a value. AOC's commonly take the form of a timing restriction for operations or no harvest reserve around the value. One of the main strategies put forth by other stakeholders is a request that these areas only have roads built and used during the winter in areas that aren't already constrained by their ecology (example black spruce lowlands stands which are affectively forested wetlands with sphagnum moss understory). This option was explored by the operational task team and Planning Team. Through these meetings it was determined that if winter roads were to be used in specific areas to mitigate concerns this could potentially be a practical option. However, if it were to be used too widely such as for the entire CLUPA G2616 it would produce a plan that is not sustainable for the companies that construct road and harvest on the forest management unit currently.</p> <p><u>A1) Hollingsworth South Road (Primary Road Corridor)</u></p> <p>For this Draft FMP, the Hollingsworth South Road is identified as an Alternative Primary Road corridor to the Hollingsworth Road. This means that unless there is compelling feedback received at this stage of planning (none received to date), the Hollingsworth Road (North option on screen grab [provided in reply]) will be the approved corridor in the upcoming FMP.</p> <p><u>A2) D'Alton road (Primary Road Corridor)</u></p> <p>Similar to the Hollingsworth South Road the D'Alton road is an Alternative Primary Road corridor. This means that unless there is compelling feedback received at this stage of planning (none received to date), the McKinley road (east option on screen grab [provided in reply]) will be the approved corridor in the upcoming FMP.</p> <p><u>B) Rocky Road (Branch Road Corridor)</u></p> <p>At this time, there are no known and/or delineated caribou nursery</p>

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Response	PT Response
						<p>areas in this geography that would otherwise also be afforded protection through a caribou nursery area timing AOC prescription. The Planning Team believes that the correct AOC prescriptions are in place to represent and thereby protect the known values of this area.</p> <p>Completion of harvest in the Rocky Road location will result in the development of a more even-aged forest condition. The presence of large and contiguous tracts of even-aged coniferous forest are ultimately what is needed to enable caribou to persist on the landscape over the long-term.</p> <p>In the screengrab [provided in reply] the highlighted white line shows the previous road that was used to harvest part of the area in the Rocky Road location. The location of the branch Road corridor known as Rocky Road in this upcoming FMP will plan to utilize as much of the previously existing road as possible before accessing the far east unharvested portion.</p> <p>Further south of this location there is also previous harvest in the Collins Lake Area. By completing harvest in this area in the upcoming FMP, we will be creating a large landscape patch which will consist of forest that ranges from 1-15 years old and which will resemble the type of disturbance that a stand-replacing wildfire would naturally, in terms of forest structure and composition. Our forest management policy directs us to emulate the effects that wildfire has on the landscape during forest management and operations.</p> <p>Recent negotiations with the resource-based tourism operator in the area have identified potential mitigation strategies to maintain the remoteness of the area.</p> <p>One of the discussions that took place was a seasonal timing restriction on the harvest close to the Tamarack Lake Wabakimi Provincial Park access point. A second constraint that was discussed was to ensure that no road maintenance under the FMP will take place on a 1.6 kilometre stretch of road from Trail Lake to the Tamarack Lake access point (see screengrab [provided in reply]).</p> <p>For these reasons, among others, the Planning Team believes that the completion of harvest in this area for this 10-year FMP best balances all the social, economic, and environmental objectives for the FMP.</p> <p>Additionally, after our formal response to your specific concerns the Planning Team provided background information regarding the considerations for caribou and Wabakimi Provincial Park in the appendix of this reply.</p>

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Respondent	PT Response
2023-2033 FMP Stage 4	69	53	09/13/2022	<p>We are a married US/British couple who are keen wilderness canoeists and have greatly enjoyed and appreciated canoeing in Wabakimi Provincial Park, and intend to visit as often as possible after being blocked the past three years by Covid and the closure of the Canadian/US border. Wabakimi is an absolute gem for anyone seeking to experience the wilderness, as too are the adjacent conservation reserves and other reserves. It still is a well-conserved area of natural boreal ecosystem. It is a beautiful area of lakes, rivers and forests, a unique and increasingly rare value. However, it is already being encroached upon, and for example, it is now the southernmost region where Woodland Caribou can breed and exist. This suggests that it is at an ecological tipping point. Woodland Caribou and other species at risk could abandon the locale with further small changes in habitat quality. It and the surrounding waters provide vital spawning habitat for walleyes and other fish that do make an important contribution to the tourist economy of the region. It is the wilderness values that bring canoeists to the area to contribute to the local and regional economy. Tourism is still relatively untapped in the area and I believe has great, sustainable potential for the economy. Without continued conservation efforts this could all be lost, irreversibly.</p> <p>We are not ideologically-driven conservationists with a single-issue viewpoint, or “tree huggers”. We are business people. We are keenly aware of the need for wood harvesting for its numerous and vital uses, and its contributions to local and national economies. We also fully recognize the pressing needs of the local and regional economy. We hope and sincerely believe that the forest industries and local and national economy and jobs and livelihoods can be improved and sustained without damaging or destroying the wilderness. Indeed, at a recent meeting we discussed how the needs of the local economy might be met while conserving the wilderness values of the Wabakimi Provincial Park and adjacent parks. We are personally very interested in these issues and will do our best to help. One measure of this is that we have provided personal financial support to help conserve the natural wilderness environment of this region, while also helping to strengthen the local and regional economies.</p> <p>We have read the entire draft 2023-2033 FMP for the Wabadowgang Noopming Forest (WNF for short). The</p>	Mitchell Legros 10/27/2022	<p>The Planning Team enjoyed reading your introduction to your comment. It is greatly appreciated that you took the time to read the FMP and recognize the level of analysis and difficult balancing act the planning team endeavors to do when creating an FMP. The planning team would also like to wish you the best of luck on your future endeavors to Wabakimi Provincial Park.</p> <p>The Planning Team has structured its reply similar to the format you submitted your comment.</p> <p><u>Southern Extent of Caribou Reproduction and Range</u></p> <p>In your e-mail you indicated that the WNF was the furthest southern extent of woodland caribou. There are indeed observations and known caribou values (e.g., caribou nursery areas) further south than the WNF. Though the values are kept in confidence, the general observations can be viewed via the following link [Link provided to “Make a Map: Natural Heritage Areas” in reply]. [Provided in reply] is a screen grab of caribou observations south of Wabakimi towards Highway 17.</p> <p><u>1) D’Alton road (Primary Road Corridor)</u></p> <p>Similar to the Hollingsworth South Road the D’Alton road is an Alternative Primary Road corridor. This means that unless there is compelling feedback received at this stage of planning (none received to date), the McKinley Road (east option on screen grab [provided in reply]) will be the approved corridor in the upcoming FMP.</p> <p><u>2) Hollingsworth South Road (Primary Road Corridor)</u></p> <p>For this Draft FMP the Hollingsworth South Road is identified as an Alternative Primary Road corridor to the Hollingsworth Road. This means that unless there is compelling feedback received at this stage of planning (none received to date), the Hollingsworth Road (North option on screen grab [provided in reply]) will be the approved corridor in the upcoming FMP.</p> <p><u>B) Rocky Road (Branch Road Corridor)</u></p> <p>At this time, there are no known and/or delineated caribou nursery areas in this geography that would otherwise also be afforded protection through a caribou nursery area timing AOC prescription. The Planning Team believes that the correct AOC prescriptions are in place to represent and thereby protect the known values of this area.</p> <p>Completion of harvest in the Rocky Road location will result in the development of a more even-aged forest condition. The presence of large and contiguous tracts of even-aged coniferous forest are ultimately what is needed to enable caribou to persist on the landscape over the long-term.</p>

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				<p>plan details the impressive amount of analysis and careful consideration given to potential impacts of the plan within the WNF, for example on Woodland Caribou and other species at risk. In addition, though, we believe that further very careful consideration needs to be given to the potential impact of the FMP on the Wabakimi Provincial Park, the other parks and reserves adjacent to Wabakimi, and the region in general. The many parks and reserves within the WNF boundaries (as described on pages 70-72 and elsewhere in the FMP) are so closely connected geographically and ecologically, that whatever happens in the vicinity undoubtedly will affect Wabakimi and other adjacent parks and reserves, as I am sure those involved in the FMP process will appreciate.</p> <p>I concur with the local people and others knowledgeable about the WNF and its ecology that certain parts of the planned logging development are just too close to the parks and reserves, and appear to be very likely to have deleterious effects on their wilderness ecologies and wilderness values. Once lost, these values will not return for decades after operations cease, if ever. Certainly, this is true of Woodland Caribou, whose continuous existence in this region is at a tipping point as I said above. The developments of most concern are (1) the extension of the D'Alton Road and logging so close to Caribou Lake, (2) the extensions of the Hollingsworth South Road close to Caribou Lake and Hollingsworth Lake and associated logging, and (3) the proposed Rocky Road development and associated logging in the areas close to Tamarack Lake and the Boiling Sand River. I believe that these developments should not be included in the 2023-2033 FMP, and that decisions should be deferred pending further consideration of the potentially irreversible deleterious impact on the wilderness ecology and wilderness values of these locations.</p>		<p>In the screengrab [provided in reply], the highlighted white line shows the previous road that was used to harvest part of the area in the Rocky Road location. The location of the branch Road corridor known as rocky road in this upcoming FMP will plan to utilize as much of the previously existing road as possible before accessing the far east unharvested portion.</p> <p>Further south of this location there is also previous harvest in the Collins Lake Area. By completing harvest in this area in the upcoming FMP, we will be creating a large landscape patch which will consist of forest that ranges from 1-15 years old and which will resemble the type of disturbance that a stand-replacing wildfire would naturally, in terms of forest structure and composition. Our forest management policy directs us to emulate the effects that wildfire has on the landscape during forest management and operations.</p> <p>In summary, Forest Management Plan objectives related to woodland caribou are very important and were considered by the Planning Team. Out of the three roads you spoke of, Biologists on the Planning Team reached consensus that the location of only two of these would be more aligned with plan objectives related to woodland caribou than other alternatives put forward. The road where no consensus could be reached regarding the importance to caribou was Rocky Road. As previously stated above, unlike the Dalton and Hollingsworth options, there are no caribou nursery areas present in the Rocky Road area that can receive associated area of concern prescriptions or further planning considerations for that matter.</p> <p>Recent negotiations with the resource-based tourism operator in the area have identified potential mitigation strategies to maintain the remoteness of the area.</p> <p>One of the discussions that took place was a seasonal timing restriction on the harvest close to the Tamarack Lake Wabakimi Provincial Park access point. A second constraint that was discussed was to ensure that no road maintenance under the FMP will take place on a 1.6 kilometre stretch of road from Trail Lake to the Tamarack Lake access point (see screengrab [provided in reply]).</p> <p>For these reasons, among others, the Planning Team believes that the completion of harvest in this area for this 10-year FMP best balances all the social, economic, and environmental objectives for the FMP.</p> <p>Upon further review of your comments the Planning Team felt it necessary to identify two other potential roads in the South Hollingsworth Road area and the Dalton Road area. As previously stated above both primary Road corridors are alternatives for the preferred route which is the McKinley (north) Hollingsworth option in this Forest Management Plan. However, the Branch Road corridors</p>

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						<p>that are identified on the same maps are planned to either be approved in this plan or carried over from the previous plan. The Branch Road corridor that overlaps the South Hollingsworth option is known as Keller Road (zoomed in version [provided in reply]) the Keller branch Road corridor will extend from the existing Hollingsworth Road (top right of image [provided in reply]) and reach its terminus just south of Howie lake.</p> <p>The Planning Team determined that the current suite of area of concern prescriptions (see summary at the end of this section) in place for draft plan adequately balances the ecologic, social and economic objectives for this Forest Management Plan. The Branch Road corridor that overlaps the D'Alton primary road alternative is known as D'Alton Road (zoomed in version [provided in reply]). The D'Alton Branch Road corridor is currently in the approved Contingency plan and the road is partially constructed.</p> <p>The Planning Team noted that this area is subject to area of concern prescriptions that protect caribou calving areas and tourism values. The Planning Team determined that the current suite of road use management strategies and area of concern prescriptions in place for draft plan adequately balances the ecologic, social and economic objectives for this Forest Management Plan.</p> <p><u>Summary of Protections in the Forest Management Plan</u></p> <p>Road Use Management Strategy</p> <p>After harvesting and silviculture activities are completed in the area, the intent is to decommission this road with an aggressive strategy that, to the extent reasonably possible, will promote forest structure and composition consistent with adjacent forest conditions, by minimizing linear features and regenerating forest stands as appropriate for the site conditions and silvicultural ground rules.</p> <p>Walleye Spawning areas</p> <p>Previous consultation opportunities with stakeholders have identified potential for a walleye spawning area close to this location however currently there is no verified value in the MNR's database. If you have any observations such as a georeferenced picture (example one taken from a Smart Phone with locational services enabled) could you please provide it to the MNR district biologist? This will assist with the verification of the value an application of an area of concern prescription.</p> <p>Caribou and Hollingsworth Lake Protections</p> <p>The Forest Management Plan includes AOC prescriptions for tourism and lake trout values at Caribou Lake (AOC "CARI-TR") and Hollingsworth Lake (AOC "HOLL-CL"). The prescription at Caribou</p>

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						<p>Lake provides a 750m plus variable width reserve, along with a seasonal (October 1 to April 30) operations zone (750-1000m) and temporary road zone (1000-1600m) around the lake. The prescription at Hollingsworth Lake provides a 1000m reserve, plus a temporary road zone (1000-1600m) around the lake. These protections are in addition to the CAR-1 nursery area, area of concern prescription which provides a no-harvest reserve as mapped, and a 1000m modified operations zone which restricts harvest during the calving period, from May 1st to August 15th.</p> <p>Caribou and Lake Trout Protections</p> <p>The Forest Management Plan is required to follow the manuals and guides which includes protection measures for woodland Caribou. Maintaining caribou habitat over the long term is a major consideration in the development of the Forest Management Plan. The entire Wabadowgang Noopming Forest is within the continuous caribou distribution zone and for this reason, the Forest Management Plan follows the direction in the Boreal Landscape Guide [Link to Boreal Landscape Guide provided in reply] and supports the priorities in the Caribou Conservation Plan. An example of caribou habitat protection at the site level is the AOC prescription for woodland caribou calving and nursery lakes (AOC ID "CAR-1" described above).</p> <p>Lakes confirmed to contain Lake Trout will receive the "LT" area of concern prescription (AOC). The full area of concern prescription for Lake Trout is attached for your review. This area of concern prescription has a 0-120m shoreline reserve as well as a 120- 1600m modified zone that restricts certain operations.</p> <p>Additionally, after our formal response to your specific concerns the Planning Team provided background information regarding the considerations for caribou and Wabakimi Provincial Park in the appendix of this reply.</p>

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Respondent	PT Response
2023-2033 FMP Stage 4	70	54	09/13/2022	<p>Boreal Woodland Caribou are a threatened species in the Armstrong area, and a barometer species to the overall health of Ontario. As a visiting canoeist and fisherman to this area, I wish to express my concern with plans to build roads and log the area east of Wabakimi Provincial Park. Logging activity destroys boreal Caribou populations. The evidence is insurmountable. Logging is unsustainable. Eco tourism provides long term sustainable , economic opportunities.</p> <p>Specifically, the proposed Hollingsworth South Road will negatively impact Caribou calving areas, and negatively affect lake trout fishing and eco tourism. And squeeze through the tight spot between Caribou Lake and Hollingsworth caribou calving areas. There is also an important walleye spawning bed, and Caribou Lake is also a prime lake trout lake. This road should either not be built at all, or at least be a very temporary winter road with only winter tree harvesting.</p> <p>2) The D'Alton Road will run in the very narrow spot between the north end of Caribou Lake (the same very important summer caribou calving on the islands) and a number of remote tourism outposts and canoe routes in the D'Alton Block that merit special protection. Once again it is my strong belief that roads in this area should be temporary, winter use and winter logging only.</p> <p>B) A proposed logging road (Rocky Road), with logging adjacent to Wabakimi Park in the area of Tamarack Lake. This area is also adjacent to the small but important Boiling Sand River. After 38 years, unbelievably there is no park management plan! Roads in this area will endanger important year-round caribou habitat just inside the park boundary around Tamarack Lake. These roads will also promote overuse of the river, campsites, fishery and fragile ecosystem with shallow soils. They will adversely effect the remoteness of the area, including the present 3 canoe outfitters (one is Indigenous), as well as future potential canoe trip guides and outfitters.</p> <p>My opinion, and the opinion of many concerned groups and citizens, is that Rocky Road should not be built in this decade during this planning period, and there should be no logging, during the 2023-2033 FMP (Forest Management Plan) period. Potentially, a better roads plan could and should be deferred until the next planning period (2033-2043). Jobs would not be lost,</p>	Mitchell Legros 09/27/2022	<p><u>A1) Hollingsworth South Road (Primary Road Corridor)</u></p> <p>For this Draft FMP the Hollingsworth South Road is identified as an Alternative Primary Road corridor to the Hollingsworth Road. This means that unless there is compelling feedback received at this stage of planning (none received to date), the Hollingsworth Road (North option on screen grab [provided in reply]) will be the approved corridor in the upcoming FMP.</p> <p>Similar to the Hollingsworth South Road the D'Alton road is an Alternative Primary Road corridor. This means that unless there is compelling feedback received at this stage of planning (none received to date), the McKinley road (east option on screen grab [provided in reply]) will be the approved corridor in the upcoming FMP.</p> <p><u>B) Rocky Road (Branch Road Corridor)</u></p> <p>At this time, there are no known and/or delineated caribou nursery areas in this geography that would otherwise also be afforded protection through a caribou nursery area timing AOC prescription. The Planning Team believes that the correct AOC prescriptions are in place to represent and thereby protect the known values of this area.</p> <p>Completion of harvest in the Rocky Road location will result in the development of a more even-aged forest condition. The presence of large and contiguous tracts of even-aged coniferous forest are ultimately what is needed to enable caribou to persist on the landscape over the long-term.</p> <p>In the screengrab [provided in reply], the highlighted white line shows the previous road that was used to harvest part of the area in the Rocky Road location. The location of the branch Road corridor known as Rocky Road in this upcoming FMP will plan to utilize as much of the previously existing road as possible before accessing the far east unharvested portion.</p> <p>Further south of this location there is also previous harvest in the Collins Lake Area. By completing harvest in this area in the upcoming FMP, we will be creating a large landscape patch which will consist of forest that ranges from 1-15 years old and which will resemble the type of disturbance that a stand-replacing wildfire would naturally, in terms of forest structure and composition. Our forest management policy directs us to emulate the effects that wildfire has on the landscape during forest management and operations.</p> <p>In summary, Forest Management Plan objectives related to woodland caribou are very important and were considered by the Planning Team. As previously stated above, unlike the Dalton and Hollingsworth options, there are no caribou nursery areas present in the Rocky Road area that can receive associated area of concern prescriptions or further planning considerations for that matter.</p>

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				but some jobs in the Armstrong area would be postponed, or shifted to other areas on the unit		<p>Recent negotiations with the resource-based tourism operator in the area have identified potential mitigation strategies to maintain the remoteness of the area.</p> <p>One of the discussions that took place was a seasonal timing restriction from July 1 to Labour Day long weekend on the harvest close to the Tamarack Lake Wabakimi Provincial Park access point. A second constraint that was discussed was to ensure that no road maintenance under the FMP will take place on a 1.6 kilometre stretch of road from Trail Lake to the Tamarack Lake access point (see screengrab [provided in reply]).</p> <p>For these reasons, among others, the Planning Team believes that the completion of harvest in this area for this 10-year FMP best balances all the social, economic, and environmental objectives for the FMP.</p> <p>Additionally, after our formal response to your specific concerns the Planning Team provided background information regarding the considerations for caribou and Wabakimi Provincial Park in the appendix of this reply.</p>

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Respondent	PT Response
2023-2033 FMP Stage 4	71	55	09/13/2022	<p>I urge this plan to be reconsidered in light of the critical need to protect Woodland Caribou habitat in the is region. The Woodland Caribou is an iconic species that governments at all levels have vowed to protect, and the Forest Management Plan as currently constituted will be highly disruptive to them, based on road-building plans and associated habitat destruction. We only get the chance to do this right once, as suites have shown no repopulation of logged areas by this species. I urge you to step back and reconsider the plan with the foregoing in mind.</p>	<p>Mitchell Legros 10/27/2022</p>	<p>The Planning Team understands your concerns and has heard similar being expressed by others.</p> <p>When developing a Forest Management Plan in the boreal forest region, Planning Teams must ensure that the policy direction for protecting woodland caribou habitat outlined in the Forest Management Guide for Boreal Landscapes is followed (note this guide is commonly referred to as the Boreal Landscape Guide or BLG) [Link to BLG provided in reply]. Within the BLG, there is direction that is based on the best available science for Planning Teams to ensure there is a sufficient amount of current and future habitat for caribou. This is done by planning harvest in a manner that would provide forest composition and structure similar to what would be found in a natural disturbance-driven forest. When developing a Forest Management Plan, planning teams are required to measure forest composition and structural (habitat) indicators through a 160-year horizon (Page 28 of the BLG). This long-term planning is known as the Long-Term Management Direction (LTMD). When measuring the compositional indicators planning teams strive to move the indicators towards or maintain within the simulated range of natural variation (otherwise known as the amount of that indicator that would be present on the forest in a natural forested state driven by wildfire). By applying this direction, which is based on the best available science, as well as harvesting in a manner that is consistent with the LTMD projections, the Planning Team should in theory be providing a sustainable amount of habitat for caribou for the 10-year Forest Management Plan.</p> <p>Where there are known and verified caribou calving/nursery areas on the Forest, the Planning Team will apply an appropriate Area of Concern (AOC) prescription to this value. This AOC prescription provides a timing restriction from May 1st to August 15th during a time when moderate to high-impact forest operation activities may otherwise have the potential to disturb caribou activity in these sensitive areas. For your reference, I have attached the full AOC prescription for caribou nursery areas in the email.</p> <p>For the above-mentioned and additional reasons, the planning team believes that the 2023-2033 FMP provides an adequate balancing of environmental, social, and economic objectives which should provide for the sustainability of this portion of Crown Forest.</p>

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Respondent	PT Response
2023-2033 FMP Stage 4	72	56	09/13/2022	<p>Hello, I am a wilderness enthusiast concerned about the long term health of the declining Woodland Caribou herd. I understand that previously logged areas have not returned back to useable Woodland Caribou habitat. Please consider the impact the proposed Hollingsworth South Road, D'Alton Road and Rocky Road would have on critical Caribou calving grounds. I had the pleasure of paddling Tamarack Lake and the Boiling Sands River area in August 2022 and look forward to future trips to the Wabakimi area.</p>	<p>Mitchell Legros 10/27/2022</p>	<p><u>Forest Regeneration Practices:</u></p> <p>The WNF is indeed a difficult forest to regenerate back to conifer stands (preferred habitat for Caribou) in certain areas where soils are advantageous for the regeneration of hardwood species. Strategy going forward with silviculture in the Wabadowgang Noopming FMP can be generally summarized in the following three points:</p> <ol style="list-style-type: none"> 1. If the area was predominantly hardwood when harvested leave the area for natural regeneration of hardwood. 2. If the area was conifer before harvesting occurred regenerate the area to conifer by artificial or natural means 3. If the area was mixed wood and had the soils advantageous for the regeneration of conifer, attempt to regenerate the area to a conifer component higher than its preharvest state. <p>(I have attached the post harvest renewal transition table FMP Table 5 for your review)</p> <p>The implementation of this strategy will be reviewable at the annual report stages of plan implementation at the Year 5 enhanced annual report, and a determination of the sustainability of the FMP silviculture will be assessed at that point. The results of the FMP's silviculture will be use as direct data inputs into future FMP post harvest renewal tables to guide the forest simulation.</p> <p><u>A1) Hollingsworth South Road (Primary Road Corridor)</u></p> <p>For this Draft FMP the Hollingsworth South Road is identified as an Alternative Primary Road corridor to the Hollingsworth Road. This means that unless there is compelling feedback received at this stage of planning (none received to date),the Hollingsworth Road (North option on screen grab [provided in reply]) will be the approved corridor in the upcoming FMP.</p> <p><u>A2) D'Alton road (Primary Road Corridor)</u></p> <p>Similar to the Hollingsworth South Road the D'Alton road is an Alternative Primary Road corridor. This means that unless there is compelling feedback received at this stage of planning (none received to date),the McKinley road (east option on screen grab [provided in reply]) will be the approved corridor in the upcoming FMP.</p> <p><u>B) Rocky Road (Branch Road Corridor)</u></p> <p>At this time, there are no known and/or delineated caribou nursery areas in this geography that would otherwise also be afforded protection through a caribou nursery area timing AOC prescription. The Planning Team believes that the correct AOC prescriptions are in place to represent and thereby protect the known values of this area.</p> <p>Completion of harvest in the Rocky Road location will result in the development of a more even-aged forest condition. The presence of</p>

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Response	PT Response
						<p>large and contiguous tracts of even-aged coniferous forest are ultimately what is needed to enable caribou to persist on the landscape over the long-term.</p> <p>In the screengrab [provided in reply], the highlighted white line shows the previous road that was used to harvest part of the area in the Rocky Road location. The location of the branch Road corridor known as rocky road in this upcoming FMP will plan to utilize as much of the previously existing road as possible before accessing the far east unharvested portion.</p> <p>Further south of this location there is also previous harvest in the Collins Lake Area. By completing harvest in this area in the upcoming FMP, we will be creating a large landscape patch which will consist of forest that ranges from 1-15 years old and which will resemble the type of disturbance that a stand-replacing wildfire would naturally, in terms of forest structure and composition. Our forest management policy directs us to emulate the effects that wildfire has on the landscape during forest management and operations.</p> <p>In summary, Forest Management Plan objectives related to woodland caribou are very important and were considered by the Planning Team. As previously stated above, unlike the Dalton and Hollingsworth options, there are no caribou nursery areas present in the Rocky Road area that can receive associated area of concern prescriptions or further planning considerations for that matter.</p> <p>Recent negotiations with the resource-based tourism operator in the area have identified potential mitigation strategies to maintain the remoteness of the area.</p> <p>One of the discussions that took place was a seasonal timing restriction from July 1st to Labour Day on the harvest close to the Tamarack Lake Wabakimi Provincial Park access point. A second constraint that was discussed was to ensure that no road maintenance under the FMP will take place on a 1.6 kilometre stretch of road from Trail Lake to the Tamarack Lake access point (see screengrab [provided in reply]).</p> <p>For these reasons, among others, the Planning Team believes that the completion of harvest in this area for this 10-year FMP best balances all the social, economic, and environmental objectives for the FMP.</p> <p>Additionally, after our formal response to your specific concerns the Planning Team provided background information regarding the considerations for caribou and Wabakimi Provincial Park in the appendix of this reply.</p>

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Respondent	PT Response
2023-2033 FMP Stage 4	73	57	09/13/2022	The proposed plan does not consider the loss of habitat for caribou and other woodland creatures. I do not support the proposed plan. Your actions carry weight and must be reconsidered. For the sake of your province and your country, please do not irreparably harm this ecosystem.	Mitchell Legros 10/27/2022	<p>When developing a Forest Management Plan in the boreal forest region, Planning Teams must ensure that the policy direction for protecting woodland caribou habitat outlined in the Forest Management Guide for Boreal Landscapes is followed (note this guide is commonly referred to as the Boreal Landscape Guide or BLG) [Link to BLG provided in reply]. Within the BLG, there is direction that is based on the best available science for Planning Teams to ensure there is a sufficient amount of current and future habitat for caribou. This is done by planning harvest in a manner that would provide forest composition and structure similar to what would be found in a natural disturbance-driven forest. When developing a Forest Management Plan, planning teams are required to measure forest composition and structural (habitat) indicators through a 160-year horizon (Page 28 of the BLG). This long-term planning is known as the Long-Term Management Direction (LTMD). When measuring the compositional indicators planning teams strive to move the indicators towards or maintain within the simulated range of natural variation (otherwise known as the amount of that indicator that would be present on the forest in a natural forested state driven by wildfire). By applying this direction, which is based on the best available science, as well as harvesting in a manner that is consistent with the LTMD projections, the Planning Team should in theory be providing a sustainable amount of habitat for caribou for the 10-year Forest Management Plan.</p> <p>The WNF Planning Team included an optional indicator of sustainability (1.4) which specifically aims "To create/maintain a suitable supply and arrangement of online Caribou habitat, by the retention and harvest of DCHS blocks through time".</p> <p>The assessment of this indicator is as follows</p> <p>The plan-start level for the % of the capable land base in DCHS blocks that are in suitable (online) habitat condition is quite high at 66%. This is due to the absence of large fires and low levels of harvest on the unit over the last 20 years, including some A blocks (now labelled as AB's) that have yet to be harvested. Online caribou habitat at the DCHS block landscape scale remains forecasted at the desired level throughout the 100-year cycle, except for a slight dip during the D-period (2061-2081), where online caribou habitat dips to 38.9%, and then rebounds to above 40% to the desired level in the E period. Also, the current U-blocks are not yet cleaned-up and assigned to a future even-aged schedule (DCHS), and therefore are delayed for development into future online habitat condition. This delay for the U blocks also contributes to the D-period dip. Overall, the indicator trend for this objective is achieved.</p> <p>Where there are known and verified caribou calving/nursery areas on the Forest, the Planning Team will apply an appropriate Area of Concern (AOC) prescription to this value. This AOC prescription provides a timing restriction from May 1st to August 15th during a time when moderate to high-impact forest operation activities may</p>

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Respondent	PT Response
						<p>otherwise have the potential to disturb caribou activity in these sensitive areas. For your reference, I have attached the full AOC prescription for caribou nursery areas in the email.</p> <p>For the above-mentioned and additional reasons, the planning team believes that the 2023-2033 FMP provides an adequate balancing of environmental, social and economic objectives which should provide for the sustainability of this portion of Crown Forest.</p>

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Respondent	PT Response
2023-2033 FMP Stage 4	74	58	09/13/2022	I am primarily concerned about preserving ecological and tourism values in the Wabadowgong Nooming Forest. The areas supporting woodland caribou should not be commercially logged. Please maintain contiguity of habitat that is not impacted by roads and logging or mining in the following previously identified areas: Caribou Lake - northern half, Caribou-Campbell-Hollingsworth Triangle, D'Alton Block, Doe-Fawn Complex /Trail Lake rd. My primary activity in the area is canoe tripping. I am prepared to have my activities restricted. I support indigenous traditional and commercial activities (logging, hunting, trapping, tourism), in the forest with the condition of identifying and protecting woodland caribou habitat(s).	Mitchell Legros 10/27/2022	<p>Your comments have been echoed by many other stakeholders on the forest in the past and we have highlighted some of the considerations specifically made for tourism and ecological constraints below as well as identifying some new ones with specific areas you brought up.</p> <p><u>A) CLUPA 2616 of Provincial crown land policy</u> I. Wildlife protection, including threatened woodland caribou. II. Fisheries, especially lake trout. III. Commercial tourism, including canoeing and ecotourism. IV. Crown Land recreation.</p> <p><u>B) Rocky Road (formally called Trail Lake Road Extension)</u> I. Must maintain the existing low-quality road to the Tamarack Lake area and beyond. II. No tree harvesting in the area. The trees are small low value at best and given the low soil depth, will not take replanting. III. Any and all access beyond Tamarack should be temporary: winter roads only, with no gravel, and be totally unusable by trucks or cars in summer. IV. The important values there include: a. important year-round caribou habitat at the very bottom and limits of their range, in all seasons. b. Lake trout V. Road access to the Boiling Sand River will cause significant damage to ecological and park values, particularly unless and until there is a park plan to manage and limit such access. VI. Current and potential ecotourism values, including remote fly-in canoe outfitting benefits to local outfitters and economy.</p> <p><u>C) D'Alton Road between the D'Alton Block and the north end of Caribou Lake</u> I. Caribou Calving/Nursery on Caribou Lake. Predator access will be enhanced by any road access nearby. All disturbance must be minimized. II. Caribou migration routes III. Caribou Lake is an important lake trout lake IV. The north end of Caribou Lake is already the most important non-airplane access point for canoeists (both customers of commercial tourism and general canoeing public) into Wabakimi (indeed almost the only one!) That will only increase in use and importance. It must remain semi-remote, as it is now. Therefore, The proposed secondary road extension is unacceptable. There should be no roads with gravel beyond the current point, Any access and logging in this plan should be very temporary, and winter only.</p> <p><u>D) Kellar Road (All the reasons stated for the D'Alton Road also apply to the Kellar Road).</u> I. Important walleye spawning area II. Remote lake trout lakes III. The are Caribou Nursery areas on Caribou Lake and</p>

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						<p>Hollingsworth Lake, very close to the proposed road. IV. The Kellar Road must be extremely temporary, and preferably winter roads and harvesting only.</p> <p><u>E) , Doe-Fawn Complex /Trail Lake Rd</u> I. Provide an overview of operations in the Area</p> <p>Structure for Reply</p> <p>Where there are similar concerns in different geographic areas that have the same response for the Planning Team, we have grouped our replies in a manner that reflects the planning team’s response for different geographic areas that would be the same. For example, many of the areas list woodland caribou and lake trout as a specific concern and the planning team’s consideration for these values would be the same for the majority of the geographic locations you listed. CLUPA 2616 of Provincial crown land policy The image [provided in reply] shows the area of CLUPA 2616 below the southeast corner of Wabakimi Provincial Park:</p> <p>A III IV, B V VI reply: CLUPA G2616 is a General Use Area that includes unique guidance and considerations for commercial tourism and fish and wildlife habitat. All of CLUPA G2616 is located outside of Wabakimi Provincial Park and is part of the managed landbase for the Forest Management Unit (FMU). The Forest Management Plan cannot simply avoid these areas in perpetuity as the forest in parts of CLUPA 2616 have reached their biological rotation age, and in the absence of fire, will result in an overmature state of the forest which is well beyond what would be considered within the natural range of variation for the area. Within the FMP, Planning Teams are required to strategically plan harvest in a manner that would drive the forest to a “natural state”. The intent of emulating the “natural state” through forest cover manipulation (harvesting) would be to provide the forest with a structure and composition that would be similar to that which would be found in a preindustrial state which on the WNF would be a forest primarily disturbed by fire. This is one of the major factors influencing decisions to allocate harvest in CLUPA G2616. By prohibiting harvest, the PT is unable to emulate natural disturbance in this area which will result in excessive overmature forest being unnecessarily retained in this part of the Forest. Deferring these areas within CLUPA 2616 is not an option for the planning team to consider – rather they must make allocation decisions in the Plan’s Long-term Management Direction. The specific land use intent is outlined below.</p> <p>LAND USE INTENT: The primary use for this area will be commercial tourism. Extractive activities such as timber harvesting, while growing in importance, will remain secondary. Road access will be managed to maintain commercial tourism and fish and wildlife habitat. Land use conflicts</p>

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						<p>will be resolved recognizing the importance of commercial recreation in the area.</p> <p>As stated in the Guide for Crown Land Use Planning, Crown land use planning provides direction for a variety of resource planning and management processes such as Forest Management Planning. Land use planning determines where forest management can take place; Forest Management Planning, then, directs how forestry will take place on lands selected for this purpose, as indicated in the Management Guidelines for Forestry and Resource Based Tourism.</p> <p>The Policy Report for general use area G2616 clearly states that commercial timber harvest is permitted. The Land Use Intent then indicates the importance of tourism in the area and this direction becomes part of the consideration during the Forest Management Planning process. This process, which strives to balance social, economic and environmental factors for a Forest Management Unit to produce a Forest Management Plan that is sustainable for all parties involved, is required to consider the direction and intent in the CLUPA policy report. The Forest Management Plan is also required to consider the values and needs of other stakeholders on the forest. Effectively the determination for how to adequately address the social components identified in your letter are meant to be handled through the consultation process for the FMP. Where there are specific locations that values could potentially be impacted by forestry operations, it is anticipated that stakeholders will bring these concerns up in the FMP's consultation process which evaluates what protection measures can be achieved in this area without disproportionately impacting the other objectives on the forest.</p> <p>A I II, B IV a b C I II III and D II III Reply: The Forest Management Plan is also required to follow Provincial policy in our FMP manuals and guides which include protection measures for woodland caribou. Maintaining caribou habitat over the long term is a major consideration in the development of the FMP. The entire WNF is within the continuous caribou distribution zone and for this reason, the FMP follows the direction in the Boreal Landscape Guide [Link to Boreal Landscape Guide provided in reply] and supports the priorities in the Caribou Conservation Plan. An example of caribou habitat protection at the site level is the Area of Concern (ACO) prescription for woodland caribou calving and nursery lakes (AOC ID "CAR-1"). This prescription will protect caribou values during FMP implementation through the application of a mapped no-harvest reserve, and restrictions (1km buffer from the reserve) on the timing of forest activities during the calving and nursery season. Caribou Lake, which you mention in your comment, is a lake that will have the CAR-1 AOC prescription applied to protect caribou calving/nursery values in that area.</p> <p>Lakes that have confirmed lake trout in them will have the "LT" AOC prescription apply to them. An AOC is a specific constraint applied to</p>

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						<p>forestry operations to protect a value. AOC's commonly take the form of a timing restriction for operations or no harvest reserve around the value. The full AOC for Lake Trout is attached for your review. This AOC prescription has a 0-120m shoreline reserve as well as a 120-1600M modified zone that restricts certain forestry operations.</p> <p>Rocky Road B I, III and V Reply: The Planning Team has considered the use of winter roads, but is unable to commit to using winter roads exclusively, because of two important reasons: 1) Summer access in the short term is critical to allow silviculture activities to occur within the harvest area (i.e. site prep, tree planting and monitoring activities) and 2) Operational flexibility is key to maintaining year-round employment for the small local workforce.</p> <p>The operational task team feels a combination of the two following value protection mechanisms in the FMP will affectively address your concerns and provide an adequate balancing of objectives for the rest of the users on the forest.</p> <p>To protect the boundaries of Wabakimi Provincial Park the AOC prescription provided by the Ministry of Environment Conservation and Parks (MECP) has been developed by MECP and applied/implemented to protect values associated with parks (full AOC has been attached in this email for your review). These roads have been identified as being in suitable or capable caribou habitat and thus are candidates for aggressive road decommissioning strategies which are intended to leave the former road surface in a state commensurate with the silviculture efforts in the adjacent cut blocks.</p> <p>B II Reply: or the considerations given to sites with shallow soils more sites that are considered non-productive v</p> <p>1. Stands that have shallow soils fall into the following ecosites (ecosite is an ecological land classification for forested stands based on the vegetation present as well as the soil texture): 11-19, 23-28. Recent research has indicated that if the stands are 80 years of age or younger, they must be harvested using a Tree Length or Cut To Length logging method to maintain adequate nutrients to facilitate forest regeneration. If the stand is 81 years of age or older it may be harvested using any of the three logging methods identified in the Silviculture Guide (Full Tree, Tree Length, Cut to Length) and studies have shown that there is no significant difference in the post harvest nutrient regime. Often the regeneration of these type of stands is direct seeding, however upon the completion of harvesting activities. a silviculture forester will inspect the stand and prescribe a silviculture prescription for reforestation that best suits the specific site.</p> <p>2. The other type of low productivity forested stands are classified as protected forest. The measurable and verifiable characteristic that necessitates the protected forest classification is known as Site Class 4. Forested stands with Site Class 4 are categorized as protected forest in the FMP and will not be selected for harvest due to their</p>

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						<p>removal from harvest eligibility. D'Alton Road between the D'Alton Block and the north end of Caribou Lake</p> <p>C I II Reply: In addition to the aforementioned standard protections that woodland caribou already receive (A I II, B IV a b C I II III and D II III Reply) there are other mutually beneficial AOC prescriptions such as a 750m reserve along Caribou and Hollingsworth Lakes with only temporary roads permitted within 1.6km. Seasonal restrictions (no operations 1.6km) are in place for Caribou Lake from April 30th to October 1st. These protections are in addition to the CAR-1 nursery area, AOC prescription. Currently the Dalton Road is identified as a Branch Road Corridor intended to be decommissioned to the similar intent as the previously identified Rocky Road Branch Road Corridor.</p> <p>C IV Reply: Woodland caribou are not known to make large migrations during their life cycle/span that would constitute them having specific migration routes in the traditional sense that the more northern Barren-ground caribou have. However, a few select smaller-scale travel corridors are known to occur within the Province and have been identified in other Forests. There are no identified woodland caribou travel corridors confirmed on the WNF. However, stakeholders who are familiar with the area hypothesized that this location could be important for animals traveling between Wabakimi Provincial Park and Lake Nipigon. This hypothesized travel corridor provided by stakeholders was previously identified to the Planning Team and was considered in the determination of primary access to the northwest corner of the Forest.</p> <p>Currently the preferred option to access the northwest corner of the forest is the McKinley Road while the D'Alton road is considered an alternative route. After this formal consultation stage, the Planning Team will be reviewing and replying to the input received to refine the proposed operations into a Final FMP.</p> <p>Kellar Road (All the reasons stated for the D'Alton Road also apply to the Kellar Road).</p> <p>D I Reply: Previous stakeholders have identified the potential for a walleye spawning area close to this location however there is currently no known value that has been confirmed on the ground in the Provincial database. If you have any observations such as a georeferenced picture (example one taken from a Smart Phone with locational services enabled), could you please provide it to the MNR district biologist? This will assist with the verification of a potential value, as well as subsequent application of an appropriate AOC prescription.</p> <p>D IV Reply: To limit the availability of a Keller Branch Road corridor and the operations around it to only be constructed and used during the winter months or irrespective of the ecological and edaphic</p>

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						<p>factors on the landscape is not a fair trade off from the perspective of the Operational Task Team. It will inevitably reduce the flexibility for operators to operate in a large area for a prolonged length of time which is not amenable at this scale. Reducing the operational flexibility could also lengthen the duration of harvesting activities in this area which is a competing objective.</p> <p>After primary harvesting and silviculture activities are completed in the area, the intent is to decommission this road with an aggressive strategy that is intended to leave the former road surface in a state commensurate with the silviculture efforts in the adjacent cut blocks. E) Doe-Fawn Complex /Trail Lake Road</p> <p>The screen grab [provided in reply] shows the operations in proximity to Trail Lake and the Doe-Fawn Lake Complex.</p> <p>As you can see in the screengrab [provided in reply], there is a Primary Road that is currently built known as Trail Lake Road that extends up to a bridge; north of that road is the Branch Road corridor known as Fawn Road. Fawn Road is planned to use mostly existing road to access the harvest allocations (green in color). In the area you will notice several solid red and red/blue hatched areas. The solid red areas are no harvest reserve AOC prescriptions and the red/blue hatched areas are modified AOC prescriptions. All of these are designed to protect ecological (e.g., WQWA-1 see attached) and tourism values (e.g., CARS-TR see attached AOC).</p> <p>The Planning Team hopes its reply has provided a better understanding of the protection provisions that are in place to protect ecological and tourism values in this FMP.</p>

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2023-2033 FMP Stage 4	75	59	09/14/2022	<p>My name is XXXXX and I am a lifelong resident of Ontario and a more recent resident of Thunder Bay, with post-secondary education in the sciences and 43 years of research experience. I am also an outdoor enthusiast and canoeist who is keenly interested in the environment of Northern Ontario and specifically Wabakimi Park. This especially includes the ecology of the wildlife in general and the protection of the endangered Woodland Caribou specifically.</p> <p>I am writing to provide a response to the Forest Management Plan, the process of which closes on September 14, 2022 at 11:59 p.m. for further public comment.</p> <p>I will address several points in the FMP, but initially I must comment on the timing and availability of information/announcements regarding the Wabadowgang Noopming Forest Management Plan.</p> <p>First, I must complain, that this entire process was basically hidden from the residents of Ontario and, more regionally, from the residents of Thunder Bay, who are the population most interested in this area. I have also been made aware that the August 18 final open house in Armstrong was poorly attended due to the fact that very few were even made aware that it was taking place. I must remind you that these taxpayer funded 10-year plans must be transparent, NOT invisible. I was not made aware of it until 3 or 4 days prior to the above deadline, upon speaking to several people who were the few that knew of this FMP.</p> <p>Given that I have so little time for in depth analysis of this document, I will keep to some brief areas that I believe are contentious.</p> <p>First and foremost, I must point out that Woodland Caribou, historically, occupied the land including regions south of Thunder Bay and into the United States. It is through constant human intervention that they have been driven further and further north, with the Wabakimi area being their most southerly and, sadly, one of the final areas for continued existence. I have never found and am not aware of any scientifically documented evidence that regions of human interference and, specifically of logging, have ever been repopulated by the Woodland Caribou.</p> <p>I have specific concerns with the land use zone called</p>	Mitchell Legros 10/27/2022	<p>The Planning Team would like to thank you for taking the time to review and comment on the Draft Wabadowgang Noopming (WNF) Forest Management Plan (FMP). In your comment submitted on September 13th, 2022, to the Planning Team, you indicated you had some concerns pertaining to:</p> <ol style="list-style-type: none"> 1. Public consultation for the (FMP) (specifically notice) 2. Impacts the FMP can have on populations of Woodland Caribou. 3. FMP operations in CLUPA 2616 <ul style="list-style-type: none"> • Request to defer harvest areas in CLUPA 2616 4. Concerns about D'Alton Road, Hollingsworth South Road and Rocky Road impacts on caribou, non-caribou ecological values, and social values. 5. Further consultation opportunities 6. APPENDIX <p>The planning team has broken up its reply by the above-mentioned sections:</p> <p><u>1. Public consultation for the (FMP) (specifically notice)</u> In your first point you expressed disappointment that there was a lack of notification regarding the Draft FMP review. Specifically, in FMP planning we are required to send a letter to all the stakeholders on the MNRF districts mailing list for the forest management unit. Please advise if you would like to be added to the District mail list. Additionally, we are required to post in a local media source (which can be paper or virtual) an advance notice of the Draft FMP and its associated review. The Planning Team did a Facebook and Twitter Post Via the MNRF official account on June 10 and July 4th as well as paper media posts in the Nipigon Red Rock Gazette (on July 12), Schreiber news (on July 12), Thunder Bay Source (on July 14), and Wawatay News Sioux Lookout (on July 22) for stage 4 Public Review of Draft Plan. With the COVID-19 pandemic, the MNRF included the following requirement for Planning Teams to have in their Notices "The Information Forum related to the review of Draft Forest Management Plan will be held via individual or group remote meetings which may be arranged by calling the individuals listed below during the review period." The additional information form you mentioned in your letter was a Planning Team decision on July 28, 2022 to hold a group information forum in which Planning Team members were encouraged to notify the stakeholder group they represented to contribute to the FMP process.</p> <p><u>2. Impacts the FMP can have on populations of Woodland Caribou.</u> When developing a forest management plan in the boreal forest region, Planning Teams must ensure that the policy direction for protecting woodland caribou habitat outlined in the Forest Management Guide for Boreal Landscapes is followed (note this guide is commonly referred to as the Boreal Landscape Guide or BLG) [Link to BLG provided in reply]. Within the BLG, there is direction that is based on the best available science for Planning Teams to ensure there is a sufficient amount of current and future</p>

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				<p>CLUPA 2616, which, I understand, is supposed to give priority to the Woodland Caribou and related wildlife and bird populations. This area can be open to canoeists and ecotourism, responsibly supported by the local wilderness outfitters. It is an important caribou calving area, active lake trout, walleye and other fish habitat and is occupied by up to 62 different species of birdlife, which has been recently observed by the Nature Conservancy.</p> <p>The development of proposed logging roads, such as Rocky Road, or the Hollingsworth or D'Alton roads, will severely impact the remoteness of this area and result in the ultimate destruction of the habitat. The caribou alone depend on year-round growth of lichens growing in sensitive soils, for their main source of nutrition. The logging and human activity will guarantee that this necessary food source to the caribou will be permanently destroyed.</p> <p>The proposed D'Alton road, running to the north end of Caribou Lake, and the Hollingsworth South road, running through the narrow strip of land between Caribou Lake and Hollingsworth Lake, will significantly impact an important calving area for the caribou. I have personally seen caribou while fishing for walleye in the narrows at the northern end of Caribou Lake. The caribou also have a year round presence in the Rocky road area.</p> <p>All three roads, mentioned above, will have other multi pronged effects. There are important canoe routes used on the Boiling Sand river, northwest of, and near the Rocky road route, which will be impacted. Also, as I mentioned from personal experience, the fishery in the area will also be affected by the other two proposed roads. There are walleye spawning beds in those waters. Add to this, the fact, that others simply go up there to take in the wildlife and environment in this area, so close to the edge of this globally significant ecological reserve. I emphasize "global" because international tourists come to see this area as one of the planet's ever diminishing wild areas. Let's not diminish it any further!</p> <p>I vehemently oppose any logging and development in this area for the 2023-2033 duration of the FMP until further protection of the habitat can be guaranteed for the preservation of all species in the CLUPA 2616. This will also strengthen the continued long term economic benefit to the local population, both</p>		<p>habitat for caribou. This is done by planning harvest in a manner that would provide forest composition and structure similar to what would be found in a natural disturbance-driven forest. When developing a Forest Management Plan, planning teams are required to measure forest composition and structural (habitat) indicators through a 160-year horizon (Page 28 of the BLG). This long-term planning is known as the Long-Term Management Direction (LTMD). When measuring the compositional indicators planning teams strive to move the indicators towards or maintain within the simulated range of natural variation (otherwise known as the amount of that indicator that would be present on the forest in a natural forested state driven by wildfire). By applying this direction, which is based on the best available science, as well as harvesting in a manner that is consistent with the LTMD projections, the Planning Team should in theory be providing a sustainable amount of habitat for caribou for the 10-year forest management plan.</p> <p>Specifically, the Planning Team for the WNF FMP included the following required indicators of sustainability for woodland caribou habitat in the FMP (which are directed by the BLG):</p> <p>1.1 Habitat Amount for Caribou within WNF – (Strategic Forest Management Model) SFMM 1.2 Texture and arrangement of caribou refuge habitat on the WNF – (Ontario's Landscape Tool) OLT 1.3 Texture and arrangement of caribou winter habitat (used and preferred) on the WNF - (Ontario's Landscape Tool) OLT as well as an optional indicator of sustainability 1.4 To create/maintain a suitable supply and arrangement of online Caribou habitat, by the retention and harvest of (Dynamic Caribou Habitat Schedule) DCHS blocks through time.</p> <p>I have included the FMP objectives table for Caribou as a separate attachment in this e-mail for your review.</p> <p>At the operational scale, where there are specific known and confirmed values such as woodland caribou calving/nursery areas on the WNF the Planning Team must have an Area of Concern (AOC) prescription in place. This AOC ensures the feature and buffer around it are not disturbed during the calving and nursery period of May 1st to August 15th. I have attached the full AOC prescription in the email as well for your review.</p> <p>3. FMP operations in CLUPA 2616 <u>The image [provided in reply] shows the area of CLUPA 2616 Below the southeast corner of Wabakimi Provincial Park.</u></p> <p>CLUPA G2616 is a General Use Area that includes unique guidance and considerations for commercial tourism and fish and wildlife habitat. The specific land use intent is outlined below. LAND USE INTENT: The primary use for this area will be commercial tourism. Extractive activities such as timber harvesting, while growing in importance, will remain secondary. Road access will be managed to maintain commercial tourism and fish and wildlife habitat. Land use conflicts will be resolved recognizing the importance of</p>

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				<p>Indigenous and ecotourism-oriented businesses. This will ultimately improve the conditions in the local community. Any economic benefit offered by the logging companies is shortsighted and ultimately destructive.</p> <p>I would have liked to comment further, but, given the lack of province-wide opportunity to be aware of this issue, I am forced to keep this brief, in order to submit my response.</p>		<p>commercial recreation in the area.</p> <p>As stated in the Guide for Crown Land Use Planning, Crown land use planning provides direction for a variety of resource planning and management processes such as Forest Management Planning. Land use planning determines where forest management can take place; Forest Management Planning, then, directs how forestry will take place on lands selected for this purpose, as indicated in the Management Guidelines for Forestry and Resource Based Tourism. The Policy Report for general use area G2616 clearly states that commercial timber harvest is permitted. The Land Use Intent then indicates the importance of tourism in the area and this direction becomes part of the consideration during the forest management planning process. This process, which strives to balance social, economic, and environmental factors for a forest management unit to produce a Forest Management Plan that is sustainable for all parties involved, is required to consider the direction and intent in the CLUPA policy report. In addition, the Forest Management Plan is also required to consider the values and needs of other stakeholders on the forest.</p> <p>The Forest Management Plan cannot simply avoid these areas in perpetuity as the forest in parts of CLUPA 2616 have reached their biological rotation age, and in the absence of fire, will result in an overmature state of the forest which is well beyond what would be considered within the natural range of variation for the area. Within the FMP, Planning Teams are required to strategically plan harvest in a manner that would drive the forest to a “natural state”. The intent of emulating the “natural state” through forest cover manipulation (harvesting) would be to provide the forest with a structure and composition that would be similar to that which would be found in a preindustrial state which on the WNF would be a forest primarily disturbed by fire. This is one of the major factors influencing decisions to allocate harvest in CLUPA G2616. By prohibiting harvest, the PT is unable to emulate natural disturbance in this area which will result in excessive overmature forest being unnecessarily retained in this part of the Forest. Deferring these areas within CLUPA 2616 is not an option for the planning team to consider – rather they must make allocation decisions in the Plan’s Long-term Management Direction.</p> <p>Many of the areas in CLUPA 2616 have been logged in the past and were able to provide sufficient road decommissioning and AOC prescription protections. These areas eventually fell into disrepair and were able to provide the current level of remoteness for Wabakimi Provincial Park. The Primary Road or Branch Road corridors identified in this area will use mostly existing roads that were previously used to access past harvest areas close to Wabakimi Provincial Park.</p> <p>The Planning Team will use tools available to them to mitigate the impacts that logging could potentially have on the remoteness of this area. The planning team has been provided or will develop AOCs and road decommissioning strategies. An AOC is a specific constraint applied to forestry operations to protect a value. AOCs</p>

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						<p>commonly takes the form of a timing restriction for operations or no harvest reserve around the value. One of the main strategies put forth by other stakeholders is a request that these areas only have roads built and used during the winter in areas that aren't already constrained by their ecology (example black spruce lowlands stands which are affectively forested wetlands with sphagnum moss understory). This option was explored by the operational task team and Planning Team. Through these meetings it was determined that if winter roads were to be used in specific areas to mitigate concerns this could potentially be a practical option. However, if it were to be used too widely such as for the entire CLUPA G2616 it would produce an FMP that is not sustainable for the companies that construct road and harvest on the WNF currently.</p> <p><u>4. Concerns about D'Alton road, Hollingsworth South Road and Rocky Road impacts on caribou, non-caribou ecological values, and social values.</u> <u>D'Alton Road (Primary Road Corridor)</u></p> <p>The D'Alton road is an Alternative Primary Road corridor. This means that unless there is compelling feedback received at this stage of planning (none received to date), the McKinley Road (east option on screen grab [provided in reply]) will be the approved corridor in the upcoming FMP.</p> <p><u>Hollingsworth South Road (Primary Road Corridor)</u></p> <p>For this Draft FMP the Hollingsworth South Road is identified as an Alternative Primary Road corridor to the Hollingsworth Road. This means that unless there is compelling feedback received at this stage of planning (none received to date), the Hollingsworth Rd (North option on screen grab [provided in reply]) will be the approved corridor in the upcoming FMP.</p> <p><u>B) Rocky Road (Branch Road Corridor)</u></p> <p>At this time, there are no known and/or delineated caribou nursery areas in this geography that would otherwise also be afforded protection through a caribou nursery area timing AOC prescription. The Planning Team believes that the correct AOC prescriptions are in place to represent and thereby protect the known values of this area.</p> <p>Completion of harvest in the Rocky Road location will result in the development of a more even-aged forest condition. The presence of large and contiguous tracts of even-aged coniferous forest are ultimately what is needed to enable caribou to persist on the landscape over the long-term.</p> <p>In the screengrab [provided in reply], the highlighted white line shows the previous road that was used to harvest part of the area in the Rocky Road location. The location of the Branch Road corridor</p>

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						<p>known as Rocky Road in this upcoming FMP will plan to utilize as much of the previously existing road as possible before accessing the far east unharvested portion.</p> <p>Further south of the allocations accessed by Rocky Road, there is also previous harvest in the Collins Lake Area. By completing harvest in this area in the upcoming FMP, we will be creating a large landscape patch which will consist of forest that ranges from 1-15 years old, and which will resemble the type of disturbance that a stand-replacing wildfire would naturally, in terms of forest structure and composition. The intent is that this area would be fully regenerated and be unavailable for forestry operations for 80+ years. Our forest management policy directs us to emulate the effects that wildfire has on the landscape during forest management and operations.</p> <p>Your concerns regarding the protection for ecological and social values in this FMP have been echoed by many other stakeholders on the WNF in the past. In the appendix of this document, we have included the Planning Team's reply (with necessary modifications for this stage of planning) to a previous stakeholders group comment regarding the concern for ecological values.</p> <p>Recent negotiations with the resource-based tourism operator in the area have identified potential mitigation strategies to maintain the remoteness of the area.</p> <p>One of the discussions that took place was a seasonal timing restriction from July 1st to Labour Day on the harvest close to the Tamarack Lake Wabakimi Provincial Park access point. A second constraint that was discussed was to ensure that no road maintenance under the FMP will take place on a 1.6 kilometre stretch of road from Trail Lake to the Tamarack Lake access point (see screengrab [provided in reply]).</p> <p>For these reasons, among others, the Planning Team believes that the completion of harvest in this area for this 10-year FMP best balances all the social, economic, and environmental objectives for the FMP.</p> <p>In summary, forest management plan objectives related to woodland caribou are very important and were considered by the Planning Team. As previously stated above, unlike the Dalton and Hollingsworth options, there are no caribou nursery areas present in the Rocky Road area that can receive associated AOC prescriptions or further planning considerations for that matter.</p> <p><u>5. Further consultation opportunities</u> The planning team noted the first part of your comment which expressed disappointment about the short notice to review, comment, or discuss the FMP with Planning Team representatives. The Planning Team wishes to extend you an invite to further discuss any additional questions or comments you may have concerning the WNF</p>

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						<p>FMP.</p> <p>If you wish to meet and discuss please don't hesitate to contact Jeffrey Cameron R.P.F. jcameron@northwindsenv.ca, Plan Author, Robin Kuzyk R.P.F. Robin.Kuzyk@ontario.ca, District Management Forester or myself. The next formal opportunity to discuss the Forest Management Plan is Stage 5 Public Inspection of the Approved Forest Management Plan which is tentatively scheduled to start on December 8th, 2022.</p> <p>If desired you can make a written request to seek resolution of issues with the MNRF Regional Director using a process described in the 2020 Forest Management Planning Manual (Part A, Section 2.4.1). Please note for this Forest Management Plan the last possible date to seek issue resolution with the MNRF Regional Director is scheduled for October 4th, 2022. Please send Issue resolution requests to Mitchell Legros (mitchell.legros@ontario.ca).</p> <p>Appendix</p> <p>As previously mentioned in the main body of your reply, below is the Planning Team's previous response to other stakeholders with similar concerns. Please note that necessary updates have been made to include changes since Stage Three review of Proposed Operations, as well as the addition of the Doe-Fawn Lake area. Your comments have been echoed by many other stakeholders on the forest in the past and we have highlighted some of the considerations specifically made for tourism and ecological constraints below as well as identifying some new ones with specific areas you brought up.</p> <p>F) <u>CLUPA 2616 of Provincial crown land policy</u></p> <p>V. Wildlife protection, including threatened woodland caribou.</p> <p>VI. Fisheries, especially lake trout.</p> <p>VII. Commercial tourism, including canoeing and ecotourism.</p> <p>VIII. Crown Land recreation.</p> <p>G) <u>Rocky Road (formally called Trail Lake Road Extension)</u></p> <p>VII. Must maintain the existing low-quality road to the Tamarack Lake area and beyond.</p> <p>VIII. No tree harvesting in the area. The trees are small low value at best and given the low soil depth, will not take replanting.</p> <p>IX. Any and all access beyond Tamarack should be temporary: winter roads only, with no gravel, and be totally unusable by trucks or cars in summer.</p> <p>X. The important values there include:</p> <p>a. important year-round caribou habitat at the very bottom and limits of their range, in all seasons.</p> <p>b. Lake trout</p> <p>XI. Road access to the Boiling Sand River will cause significant damage to ecological and park values, particularly unless and until there is a park plan to manage and limit such access.</p> <p>XII. Current and potential ecotourism values, including remote fly-in</p>

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						<p>canoe outfitting benefits to local outfitters and economy.</p> <p>H) <u>D'Alton Road between the D'Alton Block and the north end of Caribou Lake</u> I. Caribou Calving/Nursery on Caribou Lake. Predator access will be enhanced by any road access nearby. All disturbance must be minimized. II. Caribou migration routes III. Caribou Lake is an important lake trout lake IV. The north end of Caribou Lake is already the most important non-airplane access point for canoeists (both customers of commercial tourism and general canoeing public) into Wabakimi (indeed almost the only one!) That will only increase in use and importance. It must remain semi-remote, as it is now. Therefore, The proposed secondary road extension is unacceptable. There should be no roads with gravel beyond the current point, Any access and logging in this plan should be very temporary, and winter only.</p> <p>I) <u>Kellar Road (All the reasons stated for the D'Alton Road also apply to the Kellar Road).</u> V. Important walleye spawning area VI. Remote lake trout lakes VII. The are Caribou Nursery areas on Caribou Lake and Hollingsworth Lake, very close to the proposed road. VIII. The Kellar Road must be extremely temporary, and preferably winter roads and harvesting only.</p> <p>J) <u>Doe-Fawn Complex /Trail Lake Rd</u> II. Provide an overview of operations in the Area</p> <p>Structure for Reply</p> <p>Where there are similar concerns in different geographic areas that have the same response for the Planning Team, we have grouped our replies in a manner that reflects the planning team's response for different geographic areas that would be the same. For example, many of the areas list woodland caribou and lake trout as a specific concern and the planning team's consideration for these values would be the same for the majority of the geographic locations you listed. CLUPA 2616 of Provincial crown land policy The image [provided in reply] shows the area of CLUPA 2616 below the southeast corner of Wabakimi Provincial Park:</p> <p>A III IV, B V VI reply: CLUPA G2616 is a General Use Area that includes unique guidance and considerations for commercial tourism and fish and wildlife habitat. All of CLUPA G2616 is located outside of Wabakimi Provincial Park and is part of the managed landbase for the Forest Management Unit (FMU). The Forest Management Plan cannot simply avoid these areas in perpetuity as the forest in parts of CLUPA 2616 have reached their biological rotation age, and in the absence of fire, will result in an</p>

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						<p>overmature state of the forest which is well beyond what would be considered within the natural range of variation for the area. Within the FMP, Planning Teams are required to strategically plan harvest in a manner that would drive the forest to a “natural state”. The intent of emulating the “natural state” through forest cover manipulation (harvesting) would be to provide the forest with a structure and composition that would be similar to that which would be found in a preindustrial state which on the WNF would be a forest primarily disturbed by fire. This is one of the major factors influencing decisions to allocate harvest in CLUPA G2616. By prohibiting harvest, the PT is unable to emulate natural disturbance in this area which will result in excessive overmature forest being unnecessarily retained in this part of the Forest. Deferring these areas within CLUPA 2616 is not an option for the planning team to consider – rather they must make allocation decisions in the Plan’s Long-term Management Direction.</p> <p>The specific land use intent is outlined below.</p> <p>LAND USE INTENT: The primary use for this area will be commercial tourism. Extractive activities such as timber harvesting, while growing in importance, will remain secondary. Road access will be managed to maintain commercial tourism and fish and wildlife habitat. Land use conflicts will be resolved recognizing the importance of commercial recreation in the area.</p> <p>As stated in the Guide for Crown Land Use Planning, Crown land use planning provides direction for a variety of resource planning and management processes such as Forest Management Planning. Land use planning determines where forest management can take place; Forest Management Planning, then, directs how forestry will take place on lands selected for this purpose, as indicated in the Management Guidelines for Forestry and Resource Based Tourism. The Policy Report for general use area G2616 clearly states that commercial timber harvest is permitted. The Land Use Intent then indicates the importance of tourism in the area and this direction becomes part of the consideration during the forest management planning process. This process, which strives to balance social, economic and environmental factors for a Forest Management Unit to produce a Forest Management Plan that is sustainable for all parties involved, is required to consider the direction and intent in the CLUPA policy report. The Forest Management Plan is also required to consider the values and needs of other stakeholders on the forest. Effectively the determination for how to adequately address the social components identified in your letter are meant to be handled through the consultation process for the FMP. Where there are specific locations that values could potentially be impacted by forestry operations, it is anticipated that stakeholders will bring these concerns up in the FMP’s consultation process which evaluates what protection measures can be achieved in this area without disproportionately impacting the other objectives on the forest.</p>

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						<p>A I II, B IV a b C I II III and D II III Reply: The Forest Management Plan is also required to follow Provincial policy in our FMP manuals and guides which include protection measures for woodland caribou. Maintaining caribou habitat over the long term is a major consideration in the development of the FMP. The entire WNF is within the continuous caribou distribution zone and for this reason, the FMP follows the direction in the Boreal Landscape Guide [Link to Boreal Landscape Guide provided in reply] and supports the priorities in the Caribou Conservation Plan. An example of caribou habitat protection at the site level is the Area of Concern (ACO) prescription for woodland caribou calving and nursery lakes (AOC ID "CAR-1"). This prescription will protect caribou values during FMP implementation through the application of a mapped no-harvest reserve, and restrictions (1km buffer from the reserve) on the timing of forest activities during the calving and nursery season. Caribou Lake, which you mention in your comment, is a lake that will have the CAR-1 AOC prescription applied to protect caribou calving/nursery values in that area.</p> <p>Lakes that have confirmed lake trout in them will have the "LT" AOC prescription apply to them. An AOC is a specific constraint applied to forestry operations to protect a value. AOC's commonly take the form of a timing restriction for operations or no harvest reserve around the value. The full AOC for Lake Trout is attached for your review. This AOC prescription has a 0-120m shoreline reserve as well as a 120-1600M modified zone that restricts certain forestry operations.</p> <p><u>Rocky Road</u> B I, III and V Reply: The Planning Team has considered the use of winter roads, but is unable to commit to using winter roads exclusively, because of two important reasons: 1) Summer access in the short term is critical to allow silviculture activities to occur within the harvest area (i.e. site prep, tree planting and monitoring activities) and 2) Operational flexibility is key to maintaining year-round employment for the small local workforce.</p> <p>The operational task team feels a combination of the two following value protection mechanisms in the FMP will affectively address your concerns and provide an adequate balancing of objectives for the rest of the users on the forest.</p> <p>To protect the boundaries of Wabakimi Provincial Park the AOC prescription provided by the Ministry of Environment Conservation and Parks (MECP) has been developed by MECP and applied/implemented to protect values associated with parks (full AOC has been attached in this email for your review). These roads have been identified as being in suitable or capable caribou habitat and thus are candidates for aggressive road decommissioning strategies which are intended to leave the former road surface in a state commensurate with the silviculture efforts in the adjacent cut blocks.</p> <p>B II Reply: or the considerations given to sites with shallow soils more sites that are considered non-productive (too nutrient poor to support a forested area).</p>

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						<p>1. Stands that have shallow soils fall into the following ecosites (ecosite is an ecological land classification for forested stands based on the vegetation present as well as the soil texture): 11-19, 23-28. Recent research has indicated that if the stands are 80 years of age or younger, they must be harvested using a Tree Length or Cut To Length logging method to maintain adequate nutrients to facilitate forest regeneration. If the stand is 81 years of age or older it may be harvested using any of the three logging methods identified in the Silviculture Guide (Full Tree, Tree Length, Cut to Length) and studies have shown that there is no significant difference in the post harvest nutrient regime. Often the regeneration of these type of stands is direct seeding, however upon the completion of harvesting activities, a silviculture forester will inspect the stand and prescribe a silviculture prescription for reforestation that best suits the specific site.</p> <p>2. The other type of low productivity forested stands are classified as protected forest. The measurable and verifiable characteristic that necessitates the protected forest classification is known as Site Class 4. Forested stands with Site Class 4 are categorized as protected forest in the FMP and will not be selected for harvest due to their removal from harvest eligibility.</p> <p><u>D'Alton Road between the D'Alton Block and the north end of Caribou Lake</u></p> <p>C I II Reply: In addition to the aforementioned standard protections that woodland caribou already receive (A I II, B IV a b C I II III and D II III Reply) there are other mutually beneficial AOC prescriptions such as a 750m reserve along Caribou and Hollingsworth Lakes with only temporary roads permitted within 1.6km. Seasonal restrictions (no operations 1.6km) are in place for Caribou Lake from April 30th to October 1st. These protections are in addition to the CAR-1 nursery area, AOC prescription. Currently the Dalton Rd is identified as a Branch Road Corridor intended to be decommissioned to the similar intent as the previously identified Rocky Road Branch Road Corridor.</p> <p>C IV Reply: Woodland caribou are not known to make large migrations during their life cycle/span that would constitute them having specific migration routes in the traditional sense that the more northern Barren-ground caribou have. However, a few select smaller-scale travel corridors are known to occur within the province and have been identified in other Forests. There are no identified woodland caribou travel corridors confirmed on the WNF. However, stakeholders who are familiar with the area hypothesized that this location could be important for animals traveling between Wabakimi Provincial Park and Lake Nipigon. This hypothesized travel corridor provided by stakeholders was previously identified to the Planning Team and was considered in the determination of primary access to the northwest corner of the Forest.</p> <p>Currently the preferred option to access the northwest corner of the forest is the McKinley Road while the D'Alton road is considered an</p>

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						<p>alternative route. After this formal consultation stage, the Planning Team will be reviewing and replying to the input received to refine the proposed operations into a Final FMP.</p> <p><u>Kellar Road (All the reasons stated for the D'Alton Road also apply to the Kellar Road).</u></p> <p>D I Reply: Previous stakeholders have identified the potential for a walleye spawning area close to this location however there is currently no known value that has been confirmed on the ground in the Provincial database. If you have any observations such as a georeferenced picture (example one taken from a Smart Phone with locational services enabled), could you please provide it to the MNRF district biologist? This will assist with the verification of a potential value, as well as subsequent application of an appropriate AOC prescription.</p> <p>D IV Reply: To limit the availability of a Keller Branch Road corridor and the operations around it to only be constructed and used during the winter months or irrespective of the ecological and edaphic factors on the landscape is not a fair trade off from the perspective of the Operational Task Team. It will inevitably reduce the flexibility for operators to operate in a large area for a prolonged length of time which is not amenable at this scale. Reducing the operational flexibility could also lengthen the duration of harvesting activities in this area which is a competing objective.</p> <p>After primary harvesting and silviculture activities are completed in the area, the intent is to decommission this road with an aggressive strategy that is intended to leave the former road surface in a state commensurate with the silviculture efforts in the adjacent cut blocks. <u>F) Doe-Fawn Complex /Trail Lake Road</u></p> <p>The screen grab [provided in reply] shows the operations in proximity to Trail Lake and the Doe-Fawn Lake Complex.</p> <p>As you can see in the screengrab [provided in reply], there is a Primary Road that is currently built known as Trail Lake Road that extends up to a bridge; north of that road is the Branch Road corridor known as Fawn Road. Fawn Road is planned to use mostly existing road to access the harvest allocations (green in color). In the area you will notice several solid red and red/blue hatched areas. The sold red areas are no harvest reserve AOC prescriptions and the red/blue hatched areas are modified AOC prescriptions. All of these are designed to protect ecological (e.g., WQWA-1 see attached) and tourism values (e.g., CARS-TR see attached AOC).</p> <p>The Planning Team hopes its reply has provided a better understanding of the protection provisions that are in place to protect ecological and tourism values in this FMP.</p>

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2023-2033 FMP Stage 4	76	60	09/14/2022	<p>I am very concerned about the new logging roads being anticipated around the north end of Caribou Lake, adjacent to the eastern side of Wabakimi Park. The areas of Hollingswood South road and D'Alton Roads are a critical area of caribou habitat. No areas that have been logged previously have ever seen the caribou return to any of these areas. You are pushing them further and further north and eventually they will be extinct. We should be doing everything we can to make sure they have an adequate area to roam and reproduce. It is everyone's responsibility to provide a safe haven for the caribou and thus leaving the land for people to enjoy and use in conjunction with our wildlife.</p>	<p>Mitchell Legros 10/27/2022</p>	<p><u>Sothern Extent of Caribou Reproduction and Range</u> In your e-mail you indicated that the WNF was the furthest southern extent of woodland caribou. There are indeed observations and known caribou values (e.g., caribou nursery areas) further south than WNF. Though the values are kept in confidence, the general observations can be viewed via the following link [Link provided to "Make a Map: Natural Heritage Areas" in reply]. [Provided in reply] is a screen grab of caribou observations south of Wabakimi towards Highway 17.</p> <p>The specific roads you mentioned in your comment were Hollingsworth South Road and D'Alton Roads. <u>1) Hollingsworth South Road (Primary Road Corridor)</u></p> <p>For this Draft FMP the Hollingsworth South Road is identified as an Alternative Primary Road corridor to the Hollingsworth Road. This means that unless there is compelling feedback received at this stage of planning (none received to date), the Hollingsworth Road (North option on screen grab [provided in reply]) will be the approved corridor in the upcoming FMP.</p> <p><u>1) D'Alton road (Primary Road Corridor)</u></p> <p>Similar to the Hollingsworth South Road the D'Alton road is an Alternative Primary Road corridor. This means that unless there is compelling feedback received at this stage of planning (none received to date), the McKinley road (east option on screen grab [provided in reply]) will be the approved corridor in the upcoming FMP.</p> <p>Recent negotiations with the resource-based tourism operator in the area have identified potential mitigation strategies to maintain the remoteness of the area.</p> <p>One of the discussions that took place was a seasonal timing restriction from July 1st to Labour Day on the harvest close to the Tamarack Lake Wabakimi Provincial Park access point. A second constraint that was discussed was to ensure that no road maintenance under the FMP will take place on a 1.6 kilometre stretch of road from Trail Lake to the Tamarack Lake access point (see screengrab [provided in reply]).</p> <p><u>Woodland Caribou</u></p> <p>When developing a Forest Management Plan in the boreal forest region, Planning Teams must ensure that the policy direction for protecting woodland caribou habitat outlined in the Forest Management Guide for Boreal Landscapes is followed (note this guide is commonly referred to as the Boreal Landscape Guide or BLG) [Link to BLG provided in reply]. Within the BLG, there is direction that is based on the best available science for Planning Teams to ensure there is a sufficient amount of current and future</p>

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						<p>habitat for caribou. This is done by planning harvest in a manner that would provide forest composition and structure similar to what would be found in a natural disturbance-driven forest. When developing a Forest Management Plan, planning teams are required to measure forest composition and structural (habitat) indicators through a 160-year horizon (Page 28 of the BLG). This long-term planning is known as the Long-Term Management Direction (LTMD). When measuring the compositional indicators planning teams strive to move the indicators towards or maintain within the simulated range of natural variation (otherwise known as the amount of that indicator that would be present on the forest in a natural forested state driven by wildfire). By applying this direction, which is based on the best available science, as well as harvesting in a manner that is consistent with the LTMD projections, the Planning Team should in theory be providing a sustainable amount of habitat for caribou for the 10-year Forest Management Plan.</p> <p>Where there are known and verified caribou calving/nursery areas on the Forest, the Planning Team will apply an appropriate Area of Concern (AOC) prescription to this value. This AOC prescription provides a timing restriction from May 1st to August 15th during a time when moderate to high-impact forest operation activities may otherwise have the potential to disturb caribou activity in these sensitive areas. For your reference, I have attached the full AOC prescription for caribou nursery areas in the email.</p>

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2023-2033 FMP Stage 4	77	61	09/14/2022	<p>Green Technology Metals (GTM) is developing its Seymour Lake Project (Project) that is centered approximately 3km west of Seymour Lake. The 2022 resource estimate of 9.9 million tonnes at 1.04% lithium oxide is already significant and is anticipated to increase with more drilling by GTM.</p> <p>In addition to the development of the Project into a producing mine being aligned with provincial priorities for northern development and post Covid-19 economic recovery, GTM notes that the Project is also aligned with current provincial and federal government priorities to promote critical minerals and the transition to a greener economy: https://www.ontario.ca/page/ontarios-critical-minerals-strategy-2022-2027-unlocking-potential-drive-economic-recovery-prosperity https://www.canada.ca/en/natural-resources-canada/news/2021/03/canada-announces-critical-minerals-list.html</p> <p>Cooperation with the SFL holder and MNRF will be critical to the timely realization of the opportunities associated with the Project and creation of benefits for all.</p> <p>GTM requests the existing roads (Airport/Pikitigushi Road; Jackfish Road, Ferland Road) leading to the Project area be included in the FMP and future annual work schedules for maintenance and/or upgrade as needed.</p> <p>GTM requests that any tree clearing or new roads required for the Project be considered and approved by MNRF in addition to the approved allocation and roads under the approved long term management direction.</p> <p>Many thanks in advance for considering this comment. Green Technology Metals</p>	Mitchell Legros 10/27/2022	<p>In your comment submitted on September 14th, 2022, you indicated to the Planning team that you Requested that:</p> <ol style="list-style-type: none"> 1. The existing roads (Airport/Pikitigushi Road; Jackfish Road, Ferland Road) leading to the Project area be included in the FMP and future annual work schedules for maintenance and/or upgrade as needed. 2. That any tree clearing or new roads required for the Project be considered and approved by MNRF in addition to the approved allocation and roads under the approved long term management direction. <p>The goals of these requests were to assist with Green Technology Metals (GTM) development of the Seymour Lake Project.</p> <p>This request is outside the scope of a Forest Management Plan process as well as the Planning Teams authority.</p> <p>There are opportunities as you identified in your letter to have some business-to-business relationships with local companies in the area however the Forest Management Plan is not the appropriate instrument to approve aspects of mineral development projects. If you are looking for contact information for other local businesses in the area, please reach out to Robin Kuzyk R.P.F. Robin.Kuzyk@ontario.ca, District Management Forester.</p>
2023-2033 FMP Stage 4	78	10	09/14/2022	<p>This comment is in support of all of the species at risk in the Wabadowgang Noopming Forest. Their habitat needs to be preserved and protected.</p>	Mitchell Legros 09/27/2022	<p>In your comment submitted on September 14th, 2022, you indicated to the Planning team that you are in support of all of the species at risk in the Wabadowgang Noopming Forest. Their habitat needs to be preserved and protected.</p> <p>The planning team would like to ensure you that when developing Forest Management Plan it follows all the regulated manuals and guides that outlines the protection for species at risk in Ontario.</p>

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2023-2033 FMP Stage 4	79	44	09/14/2022	<p>I understand that the closing period for comment on this MNR's endorsed Plan to denude the Armstrong Area of trees, and thus eliminate vast areas of critical caribou habitat is this Thursday.</p> <p>This planning process has failed to address my Professional concerns about the future of caribou in Ontario, and only affirmed the FMP are a costly public process with guaranteed outcomes that ensure the Forestry Sectors on-going decline under the guise of being ecologically sustainable.</p> <p>At no point during this e-mail process has anyone offered to withdraw any of the Crown's land from this 10 year cutting plan, offered a single concession, or agreed that monitoring of this caribou sub-population is required in order to access the effectiveness of the Crown's "so-called" mitigative strategy, let alone make a commitment to pay for such.</p> <p>I have now officially filed this matter in my "Lost Causes" – Outlook Data File.</p>	Mitchell Legros 10/27/2022	<p>In your comment submitted on September 14th, 2022, you indicated to the Planning team you feel the planning process has failed to address your professional concerns about the future of caribou in Ontario, and only affirmed your belief that Forest Management Plans (FMP) are a costly public process with guaranteed outcomes that ensure the Forestry Sectors on-going decline under the guise of being ecologically sustainable.</p> <p>You noted that in the Planning Team's previous reply there was no offer to withdraw any of the Crown's land from this 10 year cutting plan, offered a single concession, or agreed that monitoring of this caribou sub-population is required in order to access the effectiveness of the Crown's mitigative strategy or a commitment to pay for such.</p> <p>In your previous comment you did not identify a specific request for deferral of harvest, however based on past correspondence with Planning Team representatives, the Planning Team suspects this to be in the Rocky Road area. The Planning Team believes that the operations in the Rocky Road area as well as its compliance with forest management guides and policies provides for an adequate balancing of social, economic, and environmental objectives in this FMP.</p> <p>Your previous request regarding monitoring and the commitment to a full-time monitoring of this FMP over its 10-year term, and public reporting of that resultant data as replied to with the following:</p> <p>During the implementation of an FMP, the effectiveness of forestry operations in meeting the indicators of sustainability and compliance with manual and guide requirements are already assessed. Annual and enhanced annual reports track the progression of forestry activities to ascertain how effectively the plan is achieving its objectives. If all the proposed operations comply with FMP manuals and guides, then there is no necessity to do an exceptions monitoring program in an FMP.</p> <p>The Planning Team believes it is meeting its obligations under the FMP manuals and guides and does not feel any additional monitoring for caribou populations enforced in the FMP is required.</p> <p>The Planning Team would like to share the following link [link to "Conservation Agreement for Boreal Caribou in Ontario Environmental Registry of Ontario environmental registry posting" provided in reply]. Monitoring wildlife populations is outside the scope of the FMP and the Planning Team's authority, however it does still take place, outside of this process.</p>

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Respondent	PT Response
2023-2033 FMP Stage 4	80	54	09/13/2022	<p>Boreal Woodland Caribou are a threatened species in the Armstrong area, and a barometer species to the overall health of Ontario. As a visiting canoeist and fisherman to this area, I wish to express my concern with plans to build roads and log the area east of Wabakimi Provincial Park. Logging activity destroys boreal Caribou populations. The evidence is insurmountable. Logging is unsustainable. Eco tourism provides long term sustainable , economic opportunities.</p> <p>Specifically, the proposed Hollingsworth South Road will negatively impact Caribou calving areas, and negatively affect lake trout fishing and eco tourism. Any road building in the roadless area east of Wabakimi Provincial Park will have a negative impact on the Caribou population and the long term economic health of the area. Please reconsider this dangerous threat to an already threatened population.</p>	Mitchell Legros 09/27/2022	<p><u>A1) Hollingsworth South Road (Primary Road Corridor)</u></p> <p>For this Draft FMP the Hollingsworth South Road is identified as an Alternative Primary Road corridor to the Hollingsworth Road. This means that unless there is compelling feedback received at this stage of planning (none received to date), the Hollingsworth Road (North option on screen grab [provided in reply]) will be the approved corridor in the upcoming FMP.</p> <p>Similar to the Hollingsworth South Road the D'Alton road is an Alternative Primary Road corridor. This means that unless there is compelling feedback received at this stage of planning (none received to date),the McKinley road (east option on screen grab [provided in reply]) will be the approved corridor in the upcoming FMP.</p> <p><u>B) Rocky Road (Branch Road Corridor)</u></p> <p>At this time, there are no known and/or delineated caribou nursery areas in this geography that would otherwise also be afforded protection through a caribou nursery area timing AOC prescription. The Planning Team believes that the correct AOC prescriptions are in place to represent and thereby protect the known values of this area.</p> <p>Completion of harvest in the Rocky Road location will result in the development of a more even-aged forest condition. The presence of large and contiguous tracts of even-aged coniferous forest are ultimately what is needed to enable caribou to persist on the landscape over the long-term.</p> <p>In the screengrab [provided in reply], the highlighted white line shows the previous road that was used to harvest part of the area in the Rocky Road location. The location of the branch Road corridor known as Rocky Road in this upcoming FMP will plan to utilize as much of the previously existing road as possible before accessing the far east unharvested portion.</p> <p>Further south of this location there is also previous harvest in the Collins Lake Area. By completing harvest in this area in the upcoming FMP, we will be creating a large landscape patch which will consist of forest that ranges from 1-15 years old and which will resemble the type of disturbance that a stand-replacing wildfire would naturally, in terms of forest structure and composition. Our forest management policy directs us to emulate the effects that wildfire has on the landscape during forest management and operations.</p> <p>In summary, Forest Management Plan objectives related to woodland caribou are very important and were considered by the Planning Team. As previously stated above, unlike the Dalton and Hollingsworth options, there are no caribou nursery areas present in the Rocky Road area that can receive associated area of concern prescriptions or further planning considerations for that matter.</p>

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						<p>Recent negotiations with the resource-based tourism operator in the area have identified potential mitigation strategies to maintain the remoteness of the area.</p> <p>One of the discussions that took place was a seasonal timing restriction from July 1 to Labour Day long weekend on the harvest close to the Tamarack Lake Wabakimi Provincial Park access point. A second constraint that was discussed was to ensure that no road maintenance under the FMP will take place on a 1.6 kilometre stretch of road from Trail Lake to the Tamarack Lake access point (see screengrab [provided in reply]).</p> <p>For these reasons, among others, the Planning Team believes that the completion of harvest in this area for this 10-year FMP best balances all the social, economic, and environmental objectives for the FMP.</p> <p>Additionally, after our formal response to your specific concerns the Planning Team provided background information regarding the considerations for caribou and Wabakimi Provincial Park in the appendix of this reply.</p>

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Respondent	PT Response
2023-2033 FMP Stage 4	81	14	09/13/2022	<p>Dear Mr. Cameron,</p> <p>I'm writing to express my dismay in learning that the Wabadowgang Noopming Draft Forest Management Plan 2023-2033 is considering the construction of roads through an area that I visited two years ago on a recreational canoe trip. I'm referring to a planned road running between Hollingsworth Lake and Big Caribou lake, and another running to the east of Tamarack Lake (rocky road). It seems very shortsighted to run roads through areas that are important habitat for wildlife, in particular for the woodland caribou, an endangered species. I don't believe that any mitigating actions would reduce the harm, given the sensitivity of this species to disturbance. As someone who plans on returning to this area to pursue recreational activities, contributing to sustainable local economic development, I urge you to reconsider.</p>	<p>Mitchell Legros 10/27/2022</p>	<p>The Planning Team understands your concern and has provided a some context below for the specific areas you expressed concern with.</p> <p><u>1) Hollingsworth South Road (Primary Road Corridor) or Keller Road (Branch Road Corridor)</u></p> <p>For this Draft FMP, the Hollingsworth South Road is identified as an Alternative Primary Road corridor to the Hollingsworth Road. This means that unless there is compelling feedback received at this stage of planning (none received to date),the Hollingsworth Road (North option on screen grab [provided in reply]) will be the approved corridor in the upcoming FMP.</p> <p>The above statement is presuming that the road in question you are commenting about is Hollingsworth South Road. For this FMP there is an additional Branch Road corridor known as the Keller Road.</p> <p>The Keller Road is a Branch Road corridor with an aggressive road use management strategy that is intended to leave the former road surface in a state commensurate with the silviculture efforts in the adjacent cut blocks. Additionally in the screengrab [provided in reply] you can see there are many Area of Concern (AOC) prescriptions (solid red and red/blue hatched areas) that constrained the area of operations for Keller Road. The solid red areas are no harvest reserve AOCs and the red/blue hatched areas are modified AOCs. All of these are designed to protect ecological (e.g., WQWA-1 see attached) and tourism values (e.g., CARS-TR see attached AOC).</p> <p>The Planning Team believes that there is an appropriate balancing of objectives for the Keller Road in this specific area for this FMP.</p> <p><u>B) Rocky Road (Branch Road Corridor)</u></p> <p>At this time, there are no known and/or delineated caribou nursery areas in this geography that would otherwise also be afforded protection through a caribou nursery area timing AOC prescription. The Planning Team believes that the correct AOC prescriptions are in place to represent and thereby protect the known values of this area.</p> <p>Completion of harvest in the Rocky Road location will result in the development of a more even-aged forest condition. The presence of large and contiguous tracts of even-aged coniferous forest are ultimately what is needed to enable caribou to persist on the landscape over the long-term.</p> <p>In the screengrab [provided in reply], the highlighted white line shows the previous road that was used to harvest part of the area in the Rocky Road location. The location of the Branch Road corridor known as Rocky Road in this upcoming FMP will plan to utilize as much of the previously existing road as possible before accessing the</p>

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						<p>far east unharvested portion.</p> <p>Further south of the allocations accessed by Rocky Road, there is also previous harvest in the Collins Lake Area. By completing harvest in this area in the upcoming FMP, we will be creating a large landscape patch which will consist of forest that ranges from 1-15 years old, and which will resemble the type of disturbance that a stand-replacing wildfire would naturally, in terms of forest structure and composition. The intent is that this area would be fully regenerated and be unavailable for forestry operations for 80+ years. Our forest management policy directs us to emulate the effects that wildfire has on the landscape during forest management and operations.</p> <p>In summary, Forest Management Plan objectives related to woodland caribou are very important and were considered by the Planning Team. As previously stated above, unlike the Dalton and Hollingsworth options, there are no caribou nursery areas present in the Rocky Road area that can receive associated AOC prescriptions or further planning considerations for that matter.</p> <p>Recent negotiations with the resource-based tourism operator in the area have identified potential mitigation strategies to maintain the remoteness of the area.</p> <p>One of the discussions that took place was a seasonal timing restriction from July 1st to Labour Day on the harvest close to the Tamarack Lake Wabakimi Provincial Park access point. A second constraint that was discussed was to ensure that no road maintenance under the FMP will take place on a 1.6 kilometre stretch of road from Trail Lake to the Tamarack Lake access point (see screengrab [provided in reply]).</p> <p>For these reasons, among others, the Planning Team believes that the completion of harvest in this area for this 10-year FMP best balances all the social, economic, and environmental objectives for the FMP.</p>

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Respondent	PT Response
2023-2033 FMP Stage 4	82	23	09/13/2022	<p>Dear Mr. Legros,</p> <p>I am writing to oppose the construction of logging roads adjacent to the eastern part of Wabakimi Provincial Park. Specifically the Hollingsworth South Road the D'Alton Road and the Rocky Road.</p> <p>All of these roads are in or near caribou habitat and in or near caribou calving areas. The proposed roads are also in a Land Use Area (CLUPA2616) where conflicts between logging and wildlife and wilderness tourism is supposed to be resolved in favor of the wildlife and wilderness tourism.</p> <p>I recently returned from my second canoe trip to Wabakimi Park. My group of 7 canoeist spent about \$10,000 US locally mostly in Armstrong but also in Thunder Bay and near Thunder Bay.</p> <p>One of our consensus opinions was that the noise pollution in Wabakimi Park (WPP) due to motorboats, float planes and railroads was distracting and disturbing especially in comparison to our experiences in Quetico Park and Woodland Caribou Park. The proposed Rocky Road near Tamarack Lake would not improve the situation and would interfere with the operations of some of the local outfitters.</p> <p>Having mentioned the noise factor I would like to say that the disruption to caribou habitat and calving areas and the potential disruption to fish resources is more important to me.</p> <p>Thanks for your consideration.</p>	Mitchell Legros 10/27/2022	<p><u>D'Alton road (Primary Road Corridor)</u></p> <p>Similar to the Hollingsworth South Road the D'Alton road is an Alternative Primary Road corridor This means that unless there is compelling feedback received at this stage of planning (none received to date), the McKinley road (east option on screen grab [provided in reply]) will be the approved corridor in the upcoming FMP.</p> <p><u>Hollingsworth South Road (Primary Road Corridor)</u></p> <p>For this Draft FMP the Hollingsworth South Road is identified as an Alternative Primary Road corridor to the Hollingsworth Road. This means that unless there is compelling feedback received at this stage of planning (none received to date), the Hollingsworth Road (North option on screen grab [provided in reply]) will be the approved corridor in the upcoming FMP.</p> <p><u>B) Rocky Road (Branch Road Corridor)</u></p> <p>The proposed corridor for Rocky Road follows the only feasible access to the allocations east and south of Tamarack Lake. When constructing new forestry roads, it is best practice to utilize as much as possible old roads and this is the intent for the first 8km of Rocky Road. The remaining 5km of rocky road will be new construction and the location of this portion of the road is limited by the location of waterbodies. Once harvesting and renewal activities are completed, the intent will be to decommission Rocky Road.</p> <p>Further south of the allocations accessed by Rocky Road, there is also previous harvest in the Collins Lake Area. By completing harvest in this area in the upcoming FMP, we will be creating a large landscape patch which will consist of forest that ranges from 1-15 years old and which will resemble the type of disturbance that a stand-replacing wildfire would naturally, in terms of forest structure and composition. The intent is that this area would be fully regenerated and be unavailable for forestry operations for 80+ years. Our forest management policy directs us to emulate the effects that wildfire has on the landscape during forest management and operations.</p> <p>Recent negotiations with the resource-based tourism operator in the area have identified potential mitigation strategies to maintain the remoteness of the area.</p> <p>One of the discussions that took place was a seasonal timing restriction from July 1st to Labour Day on the harvest close to the Tamarack Lake Wabakimi Provincial Park access point. A second constraint that was discussed was to ensure that no road maintenance under the FMP will take place on a 1.6 kilometre stretch of road from Trail Lake to the Tamarack Lake access point (see</p>

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Respondent	PT Response
						<p>screengrab [provided in reply]).</p> <p>For these reasons, among others, the Planning Team believes that the completion of harvest in this area for this 10-year FMP best balances all the social, economic, and environmental objectives for the FMP.</p> <p><u>FMP operations in CLUPA 2616</u> The image [provided in reply] shows the area of CLUPA 2616 Below the southeast corner of Wabakimi Provincial Park.</p> <p>CLUPA G2616 is a General Use Area that includes unique guidance and considerations for commercial tourism and fish and wildlife habitat. The specific land use intent is outlined below.</p> <p>LAND USE INTENT: The primary use for this area will be commercial tourism. Extractive activities such as timber harvesting, while growing in importance, will remain secondary. Road access will be managed to maintain commercial tourism and fish and wildlife habitat. Land use conflicts will be resolved recognizing the importance of commercial recreation in the area.</p> <p>As stated in the Guide for Crown Land Use Planning, Crown land use planning provides direction for a variety of resource planning and management processes such as Forest Management Planning. Land use planning determines where forest management can take place; Forest Management Planning, then, directs how forestry will take place on lands selected for this purpose, as indicated in the Management Guidelines for Forestry and Resource Based Tourism. The Policy Report for general use area G2616 clearly states that commercial timber harvest is permitted. The Land Use Intent then indicates the importance of tourism in the area and this direction becomes part of the consideration during the Forest Management Planning process. This process, which strives to balance social, economic, and environmental factors for a forest management unit to produce a Forest Management Plan that is sustainable for all parties involved, is required to consider the direction and intent in the CLUPA policy report. In addition, the Forest Management Plan is also required to consider the values and needs of other stakeholders on the forest.</p> <p>The Forest Management Plan cannot simply avoid these areas in perpetuity as the forest in parts of CLUPA 2616 have reached their biological rotation age, and in the absence of fire, will result in an overmature state of the forest which is well beyond what would be considered within the natural range of variation for the area. Within the FMP, Planning Teams are required to strategically plan harvest in a manner that would drive the forest to a “natural state”. The intent of emulating the “natural state” through forest cover manipulation (harvesting) would be to provide the forest with a structure and composition that would be similar to that which would be found in a preindustrial state which on the Wabadowgang Noopming Forest</p>

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Respondent	PT Response
						<p>would be a forest primarily disturbed by fire. This is one of the major factors influencing decisions to allocate harvest in CLUPA G2616. By prohibiting harvest, the PT is unable to emulate natural disturbance in this area which will result in excessive overmature forest being unnecessarily retained in this part of the Forest. Deferring these areas within CLUPA 2616 is not an option for the planning team to consider – rather they must make allocation decisions in the Plan’s Long-term Management Direction.</p> <p>Many of the areas in CLUPA 2616 have been logged in the past and were able to provide sufficient road decommissioning and area of concern prescription protections. These areas eventually fell into disrepair and were able to provide the current level of remoteness for Wabakimi provincial park. The primary road corridors or branch road corridors identified in this area will use mostly existing roads that were previously used to access past harvest areas close to Wabakimi provincial park.</p> <p>The planning team will use tools available to them to mitigate the impacts that logging could potentially have on the remoteness of this area. The planning team has been provided or will develop Area of Concern Prescriptions (AOC’s) and road decommissioning strategies. An AOC is a specific constraint applied to forestry operations to protect a value. AOC’s commonly take the form of a timing restriction for operations or no harvest reserve around the value. One of the main strategies put forth by other stakeholders is a request that these areas only have roads built and used during the winter in areas that aren’t already constrained by their ecology (example black spruce lowlands stands which are affectively forested wetlands with sphagnum moss understory). This option was explored by the operational task team and Planning Team. Through these meetings it was determined that if winter roads were to be used in specific areas to mitigate concerns this could potentially be a practical option. However, if it were to be used too widely such as for the entire CLUPA G2616 it would produce a plan that is not sustainable for the companies that construct road and harvest on the forest management unit currently</p>

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2023-2033 FMP Stage 4	83	51	09/12/2022	I am commenting on the proposed roads into the area of Caribou in Wabakimi Park. Has there been in depth evaluation of what this might do to caribou calving areas? I have come across many of these areas on wilderness canoe trips and have witnessed the change as soon as road access is developed. Please, the Caribou are important, they are losing too much land to development	Mitchell Legros 10/27/2022	<p>The Planning Team appreciates your concerns and has provided some context below for the consideration that is given to caribou and Wabakimi Provincial Park when developing an FMP.</p> <p><u>Woodland Caribou</u></p> <p>When developing an FMP in the boreal forest region, Planning Teams must ensure that the policy direction for protecting woodland caribou habitat outlined in the Forest Management Guide for Boreal Landscapes is followed (note this guide is commonly referred to as the Boreal Landscape Guide or BLG) [Link provided to BLG in reply]. Within the BLG, there is direction that is based on the best available science for Planning Teams to ensure there is a sufficient amount of current and future habitat for caribou. This is done by planning harvest in a manner that would provide forest composition and structure similar to what would be found in a natural disturbance-driven forest. When developing a Forest Management Plan, planning teams are required to measure forest composition and structural (habitat) indicators through a 160-year horizon (Page 28 of the BLG). This long-term planning is known as the Long-Term Management Direction (LTMD). When measuring the compositional indicators planning teams strive to move the indicators towards or maintain within the simulated range of natural variation (otherwise known as the amount of that indicator that would be present on the forest in a natural forested state driven by wildfire). By applying this direction, which is based on the best available science, as well as harvesting in a manner that is consistent with the LTMD projections, the Planning Team should in theory be providing a sustainable amount of habitat for caribou for the 10-year Forest Management Plan. Unlike other species at risk such as wild ginseng, caribou are considered a landscape species having large home ranges that they move across on a regular basis. This means that every single observation of caribou or caribou sign cannot be considered a “value” in the true sense that one would consider an observation of a stationary wild ginseng plant. Where there are known and verified enduring features such as caribou calving/nursery areas on the Forest, the Planning Team will apply an appropriate Area of Concern (AOC) prescription to this value. This AOC prescription provides a timing restriction from May 1st to August 15th during a time when moderate to high-impact forest operation activities may otherwise have the potential to disturb caribou activity in these sensitive areas. For your reference, I have attached the full AOC prescription for caribou nursery areas in the e-mail.</p> <p><u>Wabakimi Provincial Park</u></p> <p>To protect the boundaries of Wabakimi Provincial Park, the AOC prescription developed and provided by the Ministry of Environment Conservation and Parks (MECP) has been put in place to protect values associated with parks (full AOC has been attached in this</p>

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						<p>email for your review). In this FMP, roads close to Wabakimi Provincial Park have been identified as being in suitable or capable caribou habitat condition and thus are candidates for aggressive decommissioning strategies which are intended to leave the former road surface in a state commensurate with the silviculture efforts in the adjacent cut blocks.</p>

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Respondent	PT Response
2023-2033 FMP Stage 4	84	26	09/14/2022	<p>Thank you for your response to my comments during the stage 3 consultation process. As I am aware that the stage 4 consultation period ends September 14th, 2022, I want to reiterate one final concern - the disturbance of the Woodland Caribou habitat throughout this region.</p> <p>As you are aware, the Caribou (Boreal population), is a species at risk in this part of Ontario. and elsewhere. It is clearly proven that activities such as road creation and logging activities disrupt and endangers the important habitat of the Caribou. My concerns are that the current plan for road creation of the Hollingsworth South Road and the D'Alton Road on the northeast side of Caribou Lake will have a detrimental impact on both Caribou calving areas as well as important Caribou habitats in general. My understanding is that these proposed roads are in a special provincial Land Use Zone and that special protection for Caribou, and other wildlife is to be given priority.</p> <p>I request you reconsider road creation and logging activities in this prime Caribou habitat.</p> <p>Thank you for taking the time to read and reflect upon my concerns.</p>	Mitchell Legros 10/27/2022	<p>When developing a Forest Management Plan in the boreal forest region, Planning Teams must ensure that the policy direction for protecting woodland caribou habitat outlined in the Forest Management Guide for Boreal Landscapes is followed (note this guide is commonly referred to as the Boreal Landscape Guide or BLG) [Link to BLG provided in reply]. Within the BLG, there is direction that is based on the best available science for Planning Teams to ensure there is a sufficient amount of current and future habitat for caribou. This is done by planning harvest in a manner that would provide forest composition and structure similar to what would be found in a natural disturbance-driven forest. When developing a Forest Management Plan, planning teams are required to measure forest composition and structural (habitat) indicators through a 160-year horizon (Page 28 of the BLG). This long-term planning is known as the Long-Term Management Direction (LTMD). When measuring the compositional indicators planning teams strive to move the indicators towards or maintain within the simulated range of natural variation (otherwise known as the amount of that indicator that would be present on the forest in a natural forested state driven by wildfire). By applying this direction, which is based on the best available science, as well as harvesting in a manner that is consistent with the LTMD projections, the Planning Team should in theory be providing a sustainable amount of habitat for caribou for the 10-year Forest Management Plan.</p> <p>Specifically, the Planning Team for the WNF FMP included the following required indicators of sustainability for woodland caribou habitat in the FMP (which are directed by the BLG):</p> <ul style="list-style-type: none"> 1.5 Habitat Amount for Caribou within Wabadowgang Noopming Forest – (Strategic Forest Management Model) SFMM 1.6 Texture and arrangement of caribou refuge habitat on the Wabadowgang Noopming Forest – (Ontario's Landscape Tool) OLT 1.7 Texture and arrangement of caribou winter habitat (used and preferred) on the Wabadowgang Noopming Forest - (Ontario's Landscape Tool) OLT as well as an optional indicator of sustainability 1.8 To create/maintain a suitable supply and arrangement of online Caribou habitat, by the retention and harvest of (Dynamic Caribou Habitat Schedule) DCHS blocks through time. <p>I have included the FMP objectives table for Caribou as a separate attachment in this e-mail for your review.</p> <p>Crown Land Use Policy 2616</p> <p>CLUPA G2616 is a General Use Area that includes unique guidance and considerations for commercial tourism and fish and wildlife habitat. The specific land use intent is outlined below. LAND USE INTENT: The primary use for this area will be commercial tourism. Extraction activities such as timber harvesting, while growing in importance, will remain secondary. Road access will be managed to maintain commercial tourism and fish and wildlife habitat.</p>

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						<p>Land use conflicts will be resolved recognizing the importance of commercial recreation in the area.</p> <p>As stated in the Guide for Crown Land Use Planning, Crown land use planning provides direction for a variety of resource planning and management processes such as Forest Management Planning. Land use planning determines where forest management can take place; Forest Management Planning, then, directs how forestry will take place on lands selected for this purpose, as indicated in the Management Guidelines for Forestry and Resource Based Tourism. The Policy Report for general use area G2616 clearly states that commercial timber harvest is permitted. The Land Use Intent then indicates the importance of tourism in the area and this direction becomes part of the consideration during the Forest Management Planning process. This process, which strives to balance social, economic, and environmental factors for a forest management unit to produce a Forest Management Plan that is sustainable for all parties involved, is required to consider the direction and intent in the CLUPA policy report. In addition, the Forest Management Plan is also required to consider the values and needs of other stakeholders on the forest.</p> <p>The Forest Management Plan cannot simply avoid these areas in perpetuity as the forest in parts of CLUPA 2616 have reached their biological rotation age, and in the absence of fire, will result in an overmature state of the forest which is well beyond what would be considered within the natural range of variation for the area. Within the FMP, Planning Teams are required to strategically plan harvest in a manner that would drive the forest to a "natural state". The intent of emulating the "natural state" through forest cover manipulation (harvesting) would be to provide the forest with a structure and composition that would be similar to that which would be found in a preindustrial state which on the Wabadowgang Noopming Forest would be a forest primarily disturbed by fire. This is one of the major factors influencing decisions to allocate harvest in CLUPA G2616. By prohibiting harvest, the PT is unable to emulate natural disturbance in this area which will result in excessive overmature forest being unnecessarily retained in this part of the Forest. Deferring these areas within CLUPA 2616 is not an option for the planning team to consider – rather they must make allocation decisions in the Plan's Long-term Management Direction.</p> <p>Many of the areas in CLUPA 2616 have been logged in the past and were able to provide sufficient road decommissioning and area of concern prescription protections. These areas eventually fell into disrepair and were able to provide the current level of remoteness for Wabakimi provincial park. The primary road corridors or branch road corridors identified in this area will use mostly existing roads that were previously used to access past harvest areas close to Wabakimi provincial park.</p> <p>The planning team will use tools available to them to mitigate the impacts that logging could potentially have on the remoteness of this area. The planning team has been provided or will develop Area of</p>

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						<p>Concern Prescriptions (AOC's) and road decommissioning strategies. An AOC is a specific constraint applied to forestry operations to protect a value. AOC's commonly take the form of a timing restriction for operations or no harvest reserve around the value. One of the main strategies put forth by other stakeholders is a request that these areas only have roads built and used during the winter in areas that aren't already constrained by their ecology (example black spruce lowlands stands which are affectively forested wetlands with sphagnum moss understory). This option was explored by the operational task team and Planning Team. Through these meetings it was determined that if winter roads were to be used in specific areas to mitigate concerns this could potentially be a practical option. However, if it were to be used too widely such as for the entire CLUPA G2616 it would produce a plan that is not sustainable for the companies that construct road and harvest on the forest management unit currently</p> <p><u>Hollingsworth South Road (Primary Road Corridor)</u></p> <p>For this Draft FMP the Hollingsworth South Road is identified as an Alternative Primary Road corridor to the Hollingsworth Road. This means that unless there is compelling feedback received at this stage of planning (none received to date),the Hollingsworth Road (North option on screen grab [provided in reply]) will be the approved corridor in the upcoming FMP.</p> <p><u>D'Alton Road (Primary Road Corridor)</u></p> <p>Similar to the Hollingsworth South Road the D'Alton road is an Alternative Primary Road corridor. This means that unless there is compelling feedback received at this stage of planning (none received to date),the McKinley road (east option on screen grab [provided in reply]) will be the approved corridor in the upcoming FMP.</p> <p>In summary Caribou although not the only objective considered in Forest Management Planning is a very important objective that was considered by the Planning Team. And contributed to the selection of other routes being identified as the selected primary Road corridor for this FMP.</p>

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Forest Management Plan	Comment #	Party Number	Date of Initial Contact	Comments or Concerns	PT Respondent	PT Response
2023-2033 FMP Stage 4	85	62	07/31/2022	<p>I am writing on behalf of Ontario Nature to support the Friends of Wabakimi's proposal to protect the Reef Lake Peninsula from harvest in the 2023-2033 Wabadowgang Noopming Forest Management Plan. This area holds significant ecological, cultural and recreational value, and is an opportunity to support the province's commitment to expand Ontario's protected areas network and contribute to the federal commitment to protect 25 percent of lands and waters by 2025.</p> <p>In May of 2022, an Ontario Nature staff member joined the Friends of Wabakimi on a paddling excursion through the Big River drainage system. During this trip, they collected breeding bird data for Ontario's third Breeding Bird Atlas. These surveys identified critical habitat for a diversity of breeding birds. Several species at risk were recorded including the common nighthawk, Canada warbler and olive-sided flycatcher. Caribou habitat was also noted, and signs of caribou use, including caribou scat were identified at one of the lakeside campsites.</p> <p>Harvesting of the Reef Lake Peninsula would cause fragmentation of quality habitat for bird species and other wildlife such as caribou. We also note that protecting the Reef Lake Peninsula from harvesting would allow for tourism opportunities to be explored while maintaining the rich biodiversity of the area.</p> <p>In closing, I would like to underline the importance of engaging affected Indigenous communities and their right to free, prior and informed consent.</p> <p>Thank you for your consideration.</p>	Mitchell Legros 10/27/2022	<p>In your letter dated July 31st, 2022, to the Planning team Chair you indicated that Ontario Nature is in support of Friends of Wabakimi's proposal to protect the Reef Lake Peninsula area from operations in this FMP.</p> <p>For consistency, the Planning Team has provided the same reply for that portion of the comment.</p> <p>Thank you for providing the Planning Team information about species at risk. In Forest Management Planning, protection and protection consideration is given when there is a known potentially sensitive value associated with an area or species, for example, bird nests or den sites or stream shorelines would receive an Area of Concern (AOC) prescription. Identifying the presence of specific birds (eastern whippoorwill <i>Antrostomus vociferus</i>) in combination with a known nest site can also warrant application of an AOC prescription. However, any value must be validated by the MNRF prior to it being incorporated into the provincial values layer that receives consideration and/or protection in FMP.</p> <p>Upon review of the associated document, there only appears to be 1 specific value (eagle "stick nest" which was observed on the south side of Shoal Lake) that can be verified by the MNRF and potentially receive an AOC prescription if it is within the area of proposed forestry operations. Additionally, by providing geographically referenced data that supports your observations for the evidence of breeding, nestlings, and species at risk, this may assist the MNRF in their annual values flights by providing potentially important areas to investigate further for sensitive values information.</p> <p>The planning team is not of the opinion that the Reef Lake area requires additional protection beyond what is already afforded by our forest management guides and manuals. Areas in an FMP cannot be deferred based solely on the presence of a species at risk: MNRF would require verification that a significant habitat feature is present for the species, for example a known nest location or breeding den site. These verified values may receive an AOC prescription that may include a reserve or a timing restriction or a combination of both, based on direction from the Stand and Site Guide or as recommended by the Planning Team. Below is a link to the forest management guide for conserving biodiversity at the stand and Site scales which identifies the protection considerations for various species or specific values on the landscape [Link to Stand and Site guide provided in reply]. The Planning Team would also like to highlight that values updates can occur at anytime during plan development or implementation and having active contributions from members of the public like yourself and your team members is greatly appreciated.</p> <p>An important point to distinguishing near letter is the identification of protected areas (example parks and conservation reserves).</p>

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						<p>Planning Teams and for that matter the Forest Management Planning process has no authority over the designation of protected areas. This process lies with the Ministry of Environment Conservation and Parks.</p> <p>Section 3-part A of the Forest Management Planning Manual 2022 identifies the requirements for consultation with First Nation and Métis communities in or adjacent to forest management units.</p>

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2023-2033 FMP Stage 4	86	4	09/01/2022	<p>Thank you very much for the opportunity to comment on selected section of the draft plan. I have limited this submission to Rocky Road signage and the hardwood utilization strategy.</p> <p>Rocky Road Signage. We believe the proposed access restrictions (Use of this road by unauthorized vehicles to access Wabakimi Provincial Park is prohibited under the Public Lands" – Page 187) is inappropriate and should be rejected. This road is a current and documented entry route for public access to Wabakimi Provincial Park through a recognized public access point. This type of decision would require a much more thorough and broad consultation and public process than offered under Forest Management Planning. Current Trail Lake Road signage is sufficient. Should Ontario Parks determine through their park planning process that such restrictions are warranted and desired, we would welcome the opportunity to comment further at that time.</p> <p>Decommissioning and Rehabilitation of Roads Thank you for improving (marginally) the text around road decommissioning strategies. We appreciate the improvements but believe the descriptions of DS1 and DS2 are still weak in providing adequate guidance on intent. I trust the opportunity provided by the next few years will be taken to seek additional scientific and operational guidance that will help the future WN FMU forester draft an effective and efficient decommissioning prescription for the AWS. Maybe some text to that effect could be included elsewhere in the Plan.</p> <p>Strategy for the Harvest of Unmarketable Stands This section (4.3.6.1 Draft Plan) raises as many questions as it answers. The objectives in maintaining conifer harvest volumes from stands that have significant unmerchantable volume are clear. This is not a local problem and is shared by all northern-tier Forest Management Units in the Province. I made previous comments on the hardwood utilization strategy and I will not repeat them all here. They focussed on ecological and forest operations considerations.</p> <p>The draft plan states that "Recently, market conditions for hardwood (Poplar and Birch) have limited the</p>	<p>Mitchell Legros 10/27/2022</p>	<p><u>Rocky Road Signage.</u></p> <p>Thank you for taking the time to express your thoughts on the proposed Public Lands Act sign identified in the Draft FMP on page 187. Based on the public comments received during Draft FMP review, the proposed access restriction at Rocky Road will be removed for the Final FMP.</p> <p><u>Decommissioning and Rehabilitation of Roads</u></p> <p>Thank you for recognizing the planning team's efforts regarding wording changes for road decommissioning strategies. The planning team feels that the intent of the road use management strategy is clearly outlined and allows the forest managers to determine how best to achieve the intent of DS1 and DS2 at the AWS stage. Specific strategies for decommissioning that include silviculture activities (e.g., planting of trees) may only be determined following on-site visits by a registered professional forester to prescribe treatments that are appropriate for individual site conditions. The best time to clearly outline how a road will be decommissioned is at the stage when the road is no longer needed for forestry activities and the planning team believes that the road transfer agreement to be prepared at the AWS stage will meet this intent.</p> <p><u>Strategy for the Harvest of Unmarketable Stands</u></p> <p>The intent of the operational strategies outlined in section 4.3.6.1 is to provide certain operational flexibilities which would facilitate the maximization of conifer utilization in a manner which does not compromise the ability to achieve a desired future forest condition or compromise the long-term sustainability of the Wabadowgang Noopming Forest. The strategy will only be applied for instances where there is no market for unmarketable stands. When a market exists for all species, normal harvest will occur.</p> <p>The reference regarding the modified harvest plan being provided at least 2 weeks prior to harvest will be removed for Final plan. However, keep in mind that regardless of when the modified harvest plan is submitted, the licensee can only commence operations once the block has received cut approval from the ministry which includes the approval of the modified harvest plan.</p> <p><u>Annual Report and FRI updated for next FMP</u></p> <p>During the preparation for Annual Reports, there is no requirement to report the composition of bypass/residual stands. Areas left behind (unharvested stands) will remain available for harvest during the 10-year FMP (2023-2033). Annual reporting will also capture any changes made to the silvicultural ground rules applied with the submission of the SGR Change Layer. This is often due to discrepancies between the FRI and actual stand conditions. During</p>

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				<p>utilization of these tree species available for harvest on the Wabadowgang Noopming Forest". This phenomena has played out across the region for 25 years or more. A region-wide strategic solution is required. I do not believe the strategy as currently described addresses the inter-related issues associated with the proposed actions. At some point we may need to acknowledge that we should not be operating at such distances from the mill where we can not adequately manage the forest estate and its collective components.</p> <p>The strategy refers to stands and concentrations of unmarketable species. Stand identification and delineation is a process following established standards and these standards have many implications for how forest data is summarized, modelled and used in operational planning and reporting. One needs consistency in interpretation and application of these standards in order to maintain the integrity of the overall forest plan.</p> <ul style="list-style-type: none"> • Advance notice of 2 weeks prior to commencement of operations (line 22, pg 171) seems insufficient lead time for the forester and bio to consider implications and provide feedback in contentious areas where significant caribou habitat values or silviculture challenges exist. The strategy only refers to "attempts" to meet that time line. As we do not want to unduly delay wood harvest, a greater lead time should be "required". Surely a competent and efficient operations team will have scouted out the years' allocations enough to know the distribution and abundance of merchantable and unmerchantable wood. I believe such a modified operations plan should be filed with the AWS or at least 2 months in advance. That would give <p>the LCC an opportunity to effectively monitor the operational implementation of this strategy.</p> <ul style="list-style-type: none"> • Stands are assigned Forest units. Concentrations of unmerchantable trees are not. (lines 29-31 pg 170). They are an integral part of the stand within which they occur and are therefore part of the forest unit assigned to the larger stand (consistent accounting of area / depletions / volume estimates / SGRs). This is not an FRI flaw, this is a feature and is fundamental to our modelling assumptions. If concentrations are deferred from harvest, it is a form of residual or bypassed portion of the larger stand. The reader of this plan needs to know how this accounting will be addressed in annual reports, inventory revision or even by the company in order to know where to go should a market 	<p>development of the next FMP, the planning team will assess the Dynamic Caribou Habitat Blocks and determine what blocks should remain open or closed for harvest (the amount of eligible area remaining in the block is one consideration that will help the planning team determine if the block should remain open or closed).</p> <p><u>Unharvested area</u></p> <p>As indicated above, areas left behind (unharvested stands) will remain available for harvest during 10-year the FMP (2023-2033). It would not be in the best interest of the Landscape pattern objective to replace the unharvested area with other area elsewhere. The intent is to fully deplete the DCHS block and thus create an even aged depletion. An amendment to replace unharvested stands with stands elsewhere would not be consistent with the LTMD and therefore not be accepted by the MNRF.</p>

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				<p>develop. Figure 39 is insufficient to clarify this issue. It appears to assign new FU designations to sub-components of a stand. They are either part of the conifer dominated stand or they were hardwood stands in their own right. The normal minimum polygon size for FRI stands is 8 ha and it is not uncommon for ConMx stands to have unmerchantable wood integrated into both the stand boundary with yield curves calculated accordingly. Unmerchantable conifer occurs within these stands as well especially on shallow soils based on minimum stand size and mapping standards.</p> <ul style="list-style-type: none"> • Should concentrations of unmarketable species be left behind from conifer and conifer dominated stands and the rest of the stand and the conifer within is harvested, essentially the entire stand (as represented by that FU) has been depleted. It would be improper and unethical to declare that we only harvested 70% of that forest unit and then go looking for 30% more of the forest unit to be addressed through contingency wood or other operating blocks. This strategy should offer assurances that this is not intended and will not happen. • Please include a new point on how the results of this strategy will be addressed in the Annual Report, especially with respect to tracking depletions and silviculture. It is unique enough that current technical specs do not address this issue. Alternatively, point to the portion of the technical specifications for the Annual Report that explain how implementation of the hardwood strategy is addressed. • The adjacency rule (line 32-34 pg 170) is reasonable. • The stubbing rule (line 38-40 pg 170) is supported. • Finally, I am still hard pressed to differentiate the hardwood strategy from landscape level "high-grading" that will, over the long term, lower the overall value, ecological integrity and sustainability of the forest estate. This is especially true if it compromises the implementation of guidelines and best practices in the Boreal Landscape Guide. Forestry high grading is defined as a selective type of timber harvesting that removes the highest grade of timber (i.e. the most merchantable stems) in an area of forest. This strategy seems to be elevating the concept to the landscape level where bypassed stands and concentrations are left as residual habitats, seed sources, and influencers of future forest succession while at the same time complicating the process of forest renewal at both the stand and landscape scale. 		

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				Thanks again for the opportunity to comment.		

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2023-2033 FMP Stage 4	87	63	08/25/2022	<p>One of the largest lakes within this plan is Caribou Lake and it also shares the east buffer boundary of Wabakimi Park. It has three remote tourism businesses and a few smaller properties on the north end and one public access at the south east corner.</p> <p>ROADS: There was much concern with access on the east side of Caribou going northly and across the top of the lake. The recommended changes to the east side of the lake (extension of McKinley Lake Road to Hollinsworth Road has, I think, been a reasonable compromise. Where the Hollingsworth Road branches more south easterly as Keller Road still brings us much concern. We would recommend that this area be named an AOC (Area of Concern) and consideration given to defer the harvest in this area to the next plan. and We recommend that there be a 1000-meter buffer and view shed to Caribou Lake. Rational: Caribou values, spawning area for fishery in Caribou Lake, Tourism recreational values and CLUPA 2616 (Provincial Land Use Plan).</p> <p>One other omission in the plan brought to my attention, is the fact that Caribou Lake is the one of the head waters for the whole north flow of water into Smooth Rock Lake and Whitewater Lake. This is incredibly important in planning for ten years out and the preservation of our pristine waters.</p> <p>ECONOMIC VALUES: I do not feel there has been enough attention to the development of LOCAL economic benefits to the resident of this area. Social and economic assessments should not be based on harvest area and volumes. We are pleased to see Sagatay's (Whitesand First Nation) role in the road maintenance and building and the local jobs that provides. Areas of the business side of the FMP including local Administration (none), Harvesting (none), Processing (none) as of this writing, Reforestation (none). I feel confident that given some thought and interest and collaboration by the Ontario Ministry of Northern Development, Mines, Natural Resources and Forestry (NDMNR), the Communities of Whitesand First Nation and Armstrong and the Forest Company, far more socio-economic benefits could be developed.</p>	Mitchell Legros 10/27/2022	<p>ROADS: The Planning Team appreciates your recognition of the difficulty in selecting the extension of the McKinley Road using the Hollingsworth Road for this FMP. In your letter you propose that the Planning Team extend the current reserve area of concern prescription from 750 meters to 1000 meters around Caribou Lake. Your concerns are concentrated around the North End of Caribou Lake in the Keller Road area. Similar comments were submitted at Stage 3 of consultation for this FMP and are appended to this reply for your review.</p> <p>The screengrab [provided in reply] depicts the Keller Road area.</p> <p>Please note that in addition to the 750 meter no harvest reserve there is an additional 1.6 kilometer area of concern prescription for lake trout around Caribou lake that limits the construction of permanent road features (the full area of concern is attached in this e-mail for your review). The Planning Team believes the current broad protection for the lake will best balance objectives for the plan however, if there are very specific areas you would like to discuss please feel free to reach out to the plan author or members of the Planning Team to initiate discussions for specific areas.</p> <p>The second part of your comment inquired about a viewshed analysis being conducted for Caribou Lake. [Provided in reply] was the viewshed analysis that was conducted for Stage 3 and from the points of observation, there are currently no areas that would be seen that overlap with planned harvest areas, except for a small amount area on the South end of Caribou Lake.</p> <p>ROADS: The Planning Team appreciates your recognition of the difficulty in selecting the extension of the McKinley Road using the Hollingsworth Road for this FMP. In your letter you propose that the Planning Team extend the current reserve area of concern prescription from 750 meters to 1000 meters around Caribou Lake. Your concerns are concentrated around the North End of Caribou Lake in the Keller Road area. Similar comments were submitted at Stage 3 of consultation for this FMP and are appended to this reply for your review.</p> <p>The screengrab [provided in reply] depicts the Keller Road area</p> <p>Please note that in addition to the 750 meter no harvest reserve there is an additional 1.6 kilometer area of concern prescription for lake trout around Caribou lake that limits the construction of permanent road features (the full area of concern is attached in this e-mail for your review). The Planning Team believes the current broad protection for the lake will best balance objectives for the plan however, if there are very specific areas you would like to discuss please feel free to reach out to the plan author or members of the</p>

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				<p>CHEMICAL AERIAL TREATMENT:</p> <p>The plan identifies approximately 3,632 has of 54,998 has planned harvest for aerial spraying. While this type of treatment is a tool for successful forest renewal, a more "aggressive time frame to renewal" can minimize the need for aerial spraying and should be implemented to minimize the need of chemicals.</p> <p>Wabakimi Park This wilderness park was originally established in 1983 and further areas were included and expanded in 1995 and 1999. While not part of the FMP area, its proximity to this plan is critical. Committees worked hard to establish boundaries and collaborated with many interested individuals and groups. The Government of Ontario committed to a Park Plan. Fast forward 40 years still, no park plan. This must be undertaken prior to the next FMP rotation of 2033. I think efforts from all parties must be focused to have the Park Plan developed and approved prior to development of the next FMP.</p>		<p>Planning Team to initiate discussions for specific areas.</p> <p>The second part of your comment inquired about a viewshed analysis being conducted for Caribou Lake. [Provided in reply] was the viewshed analysis that was conducted for Stage 3 and from the points of observation, there are currently no areas that would be seen that overlap with planned harvest areas, except for a small amount area on the South end of Caribou Lake.</p> <p>In your comment you also mentioned importance of Caribou Lake being the head waters for the whole North flow of water into Smooth Rock Lake and Whitewater Lake. In Forest Management Planning we are required to have standard area of concern prescriptions for the protection of water outlined in the Standand Site Guide. Attached in this email is area of concern prescription for this specific FMP.</p> <p>ECONOMIC VALUES: The Planning Team and the FMP do not have control over who has the right to harvest the planned harvest area or undertake any of the additional complementary forestry activities that are generated. The FMP can only make a sustainable amount of available harvest area (AHA) available. There are many factors beyond the Planning Team's control that will dictate who, how much and when the areas made available in this plan can be utilised. The Planning Team shares your sentiments in the hopes that the FMP will benefit the local economy of Whitesand and Armstrong, both in the areas made available for harvest as well as the protections established to balance and protect social, economic and environmental objectives.</p> <p>CHEMICAL AERIAL TREATMENT: The Planning Team agrees aerial herbicide is a useful tool to achieve successful renewal. The Planning Team also agrees that where appropriate in areas with specific site conditions, other methods of forest regeneration such as hot planting or leaving for natural regeneration will be more beneficial and appropriate given the constraints in the area.</p> <p>Wabakimi Park: the Planning Team recognizes the importance of the park and has established an area of concern prescription around the boundaries of Wabakimi (whole area of concern attached in this e-mail for your reference). The development and responsibility of a park management plan rests with the Ministry of Environment Conservation and Parks (MECP). The Planning Team and FMP have no authority over the development of a park management plan. When comments are received as part of the Forest Management Planning process, advisors form MECP are provided an opportunity to review summaries of the comments or are made aware of the comments being received.</p>

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2023-2033 FMP Stage 4	88	8	09/14/2022	<p>1) LCC Representative to Planning Team 2) Caribou biologist 3) Commercial Tourism Operator. I am sending my comments in for all 3 of the above roles, but I will separate them within this document, as each is a rather unique perspective. I am willing that these comments be shared publicly or with any interested parties.</p> <p>1) As the Representative of the LCC There is a wide range of opinions/feelings within the LCC. They range from deferring the roads and harvest on all the CLUPA areas to 2033, to temporary roads, to access controls, to winter roads and harvests. As LCC rep, here are my suggestions: a) Hollingsworth South and D'Alton Road. Prefer winter roads and harvest. That protects: i) Summer caribou calving on Hollingsworth and Caribou North ii) Walleye spawning beds at mouth of Campbell Creek iii) Perception of remoteness and commercial tourism business values in CLUPA 2616 iv) Lake trout fishery b) Rocky Road: This area should be/must be deferred until next plan i) Protects currently used year-round caribou use for another decade Integrated Range Assessment for Woodland Caribou and their Habitat- Nipigon Range 2010 (2014). In this report, it was reported that the interpretation of the state of caribou habitat in the area is 38.4% disturbed as of 2014 52- it was additionally noted that the area-disturbance estimate for the Nipigon Range may have been as high as 48.2% in 2014. 53At such a high level, the Ontario government noted that "it is unlikely that the range could sustain caribou" The Integrated Range Assessment states that the studies conducted in the Nipigon range "suggest a declining trend over the short-term" with other "long-term trend indicators also suggest a declining trend".56 Statistical evidence suggests that the caribou population in the area in "1996 was 178 caribou as compared to 278 caribou" which was reported in 1989"..... In the Armstrong, Ontario area in the late 1990's, it was proposed that there were three main factors attributing to how harvesting equates to a direct decline in caribou populations: direct habitat effects (including loss of habitat), indirect habitat effects (including increase of predation) and direct disturbance effects (including anthropogenic influences).67 When considering mitigative techniques to ensure forestry</p>	Mitchell Legros 10/27/2022	<p>During our past few meetings we discussed the following topics and you identified that your concerns from a Caribou biologist perspective would push you to request issue resolution in the Rocky Road Area. Below is some of the information that was provided and discussed during our planning team meetings.</p> <p>When developing a forest management plan in the boreal forest region, Planning Teams must ensure that the policy direction for protecting woodland caribou habitat outlined in the Forest Management Guide for Boreal Landscapes is followed (note this guide is commonly referred to as the Boreal Landscape Guide or BLG) [link to BLG provided in reply]. Within the BLG, there is direction that is based on the best available science for Planning Teams to ensure there is a sufficient amount of current and future habitat for caribou. This is done by planning harvest in a manner that would provide forest composition and structure similar to what would be found in a natural disturbance-driven forest. When developing a Forest Management Plan, Planning Teams are required to measure forest composition and structural (habitat) indicators through a 160-year horizon (Page 28 of the BLG). This long-term planning is known as the Long-Term Management Direction (LTMD). When measuring the compositional indicators Planning Teams strive to move the indicators towards or maintain within the simulated range of natural variation (otherwise known as the amount of that indicator that would be present on the forest in a natural forested state driven by wildfire). By applying this direction, which is based on the best available science, as well as harvesting in a manner that is consistent with the LTMD projections, the Planning Team should in theory be providing a sustainable amount of habitat for caribou for the 10-year forest management plan.</p> <p>Specifically, the Planning Team for the WNF FMP included the following required indicators of sustainability for woodland caribou habitat in the FMP (which are directed by the BLG): 1.9 Habitat Amount for Caribou within WNF – (Strategic Forest Management Model) SFMM 1.10 Texture and arrangement of caribou refuge habitat on the WNF – (Ontario's Landscape Tool) OLT 1.11 Texture and arrangement of caribou winter habitat (used and preferred) on the WNF - (Ontario's Landscape Tool) OLT 1.12 To create/maintain a suitable supply and arrangement of online Caribou habitat, by the retention and harvest of (Dynamic Caribou Habitat Schedule) DCHS blocks through time.</p> <p>I have included the FMP objectives table for Caribou as a separate attachment in this e-mail for your review. At the operational scale, where there are specific known and confirmed values such as woodland caribou calving/nursery areas on the WNF the Planning Team must have an Area of Concern (AOC) prescription in place. This AOC ensures the feature and buffer around it are not disturbed during the calving and nursery period of May 1st</p>

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				<p>practices have minimal harm on caribou populations in Northern Ontario, experts emphasize the following operations: Protection of winter conservation areas, significant calving areas and traditional migration routes from logging; Directing timber harvest to forest stands of least value to caribou; Restricting migration routes from logging; Directing timber harvest to forest stands of least value to caribou; Modified site preparation and regeneration, and Restricted road access.</p> <p>ii) Protects Boiling Sand River fragile sites from overuse.</p> <p>iii) Maintains current access, poor as that currently is.</p> <p>iv) Good likelihood of an approved Park Plan before 2033?</p> <p>v) Unlike proposals by some people and groups to create it as a Conservation Area or other protected area status, it would maintain the AHA and keep the option open for future harvest.</p> <p>vi) It would maintain jobs (both tourism and forestry) in the longer term.</p> <p>As a caribou biologist, here are my recommendations:</p> <p>a) Hollingsworth South and D'Alton Road. Prefer winter roads and harvest. That protects Summer caribou calving on Hollingsworth and Caribou North. My research on caribou seems to show that a minimum of 2-3 km is the limit of tolerance for roads and disturbance. Caribou seem to at some point (Amount, noise, frequency of disturbance) hit a tipping point where they abandon habitats that are otherwise suitable. Roads also permit/enhance predation by wolves and bears. I am hopeful that</p> <p>i) Roads and logging are winter</p> <p>ii) Roads and logging occur over the shortest possible time frame</p> <p>iii) Roads of any sort are as short-lived as possible</p> <p>iv) Over the harvest period and before roads are de-commissioned, they are as non-passable as possible, by any and all means available.</p> <p>b) Rocky Road. I am STRONGLY recommending a deferral of the road and harvesting for 10 years, until the 2033-43 plan. This will allow:</p> <p>i) 10 more years of little disturbance to caribou in the Boiling Sand area</p> <p>ii) More research on caribou usage/numbers in all seasons</p> <p>iii) Permit the caribou to hang on at the southern</p>		<p>to August 15th. I have attached the full AOC prescription in the email as well for your review.</p> <p>6. FMP operations in CLUPA 2616 The image [provided in reply] shows the area of CLUPA G2616 adjacent to Wabakimi Provincial Park.</p> <p>CLUPA G2616 is a General Use Area that includes unique guidance and considerations for commercial tourism and fish and wildlife habitat. The specific land use intent is outlined below.</p> <p>LAND USE INTENT: The primary use for this area will be commercial tourism. Extractive activities such as timber harvesting, while growing in importance, will remain secondary. Road access will be managed to maintain commercial tourism and fish and wildlife habitat. Land use conflicts will be resolved recognizing the importance of commercial recreation in the area.</p> <p>As stated in the Guide for Crown Land Use Planning, Crown land use planning provides direction for a variety of resource planning and management processes such as Forest Management Planning. Land use planning determines where forest management can take place; Forest Management Planning, then, directs how forestry will take place on lands selected for this purpose, as indicated in the Management Guidelines for Forestry and Resource Based Tourism.</p> <p>The Policy Report for general use area G2616 clearly states that commercial timber harvest is permitted. The Land Use Intent indicates the importance of tourism in the area and this direction becomes part of the consideration during the forest management planning process. This process, which strives to balance social, economic, and environmental factors for a forest management unit to produce a Forest Management Plan that is sustainable for all parties involved, is required to consider the direction and intent in the CLUPA policy report. In addition, the Forest Management Plan is also required to consider the values and needs of other stakeholders on the forest.</p> <p>Within the FMP, Planning Teams are required to strategically plan harvest in a manner that would emulate a "natural state". The intent of emulating the "natural state" through forest cover manipulation (harvesting) would be to provide the forest with a structure and composition that would be similar to that which would be found in a preindustrial state which on the WNF would be a forest primarily disturbed by fire. Harvesting in a pattern that emulates fire disturbance will provide a landscape that provides for caribou habitat objectives over the long term.</p> <p>Many of the areas in CLUPA 2616 have been logged in the past and were able to provide sufficient road decommissioning and AOC prescription protections. These areas eventually fell into disrepair and were able to provide the current level of remoteness for</p>

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				<p>limit of their continuous range (the MOST important part of the range of the woodland caribou, that have steadily retreated northward from Minnesota and Wisconsin to the present line at the southern edge of Wabakimi).</p> <p>iv) The creation and hopefully approval of a park plan that addresses caribou concerns and management strategies (including limiting and managing use by canoeists)</p> <p>v) Perhaps by then there may be evidence of caribou actually using potential habitats that have been created by logging through the experimental Caribou Mosaic? It is an interesting but so far unsuccessful experiment to create future caribou habitat. My personal and professional opinion on that is quite skeptical; I hope I am wrong! But there are two key aspects to a plan to protect/restore a threatened species: 1) Maintenance/protection/creation/restoration of suitable habitats. But... 2) #1 is irrelevant unless populations/ gene pools are maintained.</p> <p>As a Canoe Outfitter and commercial tourist outfitter with a multi-million \$ investment in outfitting in and near Wabakimi:</p> <p>a) Hollingsworth South and D'Alton Road. I direct and outfit some clients to both the north end of Caribou Lake and the D'Alton Block of lakes and rivers. Little Caribou Lake and the northern portion of Caribou Lake are THE most important access to Wabakimi park. The vast majority of canoe trips begin or end there (or both!). It is important that these areas maintain the perception of wildness, if not pure wilderness. Many of our clients see and enjoy sightings of caribou there. Both canoeists and caribou enjoy the same habitats! They both also hate mechanical noise and disturbance. Hence, everything that can be done to maintain freedom from noise and disturbance is important. It would be best for both if future roads and logging near those areas be 1) 2-3 km from summertime calving/canoeing habitat. 2) Wintertime.</p> <p>b) Rocky Road: While as I said above, a 10-year deferral would be best for caribou, it would also be best for the commercial canoe outfitters. There are currently 2 full time canoe outfitters (Wabakimi Outfitters and Mattice Lake Outfitters). There is one part time indigenous canoe trip outfitter. There is a much larger potential for new canoe outfitters. There is a particular potential for trips guided by indigenous guides. Tamarack Lake and the Boiling Sand River are magical. It is among the highest in the park for canoeing values (e.g. scenery, campsite quality if not quantity, fishing, remoteness, quiet, sightings of</p>		<p>Wabakimi Provincial Park. The Primary Road or Branch Road corridors identified in this area will use mostly existing roads that were previously used to access past harvest areas close to Wabakimi Provincial Park</p> <p>During our Planning Team meeting you indicated that the last issue you had that you would be willing to go to issue resolution on was the rocky road branch Rd corridor and its associated harvest. Below is a summary of the points made regarding that topic</p> <p><u>B) Rocky Road (Branch Road Corridor)</u></p> <p>At this time, there are no known and/or delineated caribou nursery areas in this geography that would otherwise also be afforded protection through a caribou nursery area timing AOC prescription. The Planning Team believes that the correct AOC prescriptions are in place to represent and thereby protect the known values of this area.</p> <p>Completion of harvest in the Rocky Road location will result in the development of a more even-aged forest condition. The presence of large and contiguous tracts of even-aged coniferous forest are ultimately what is needed to enable caribou to persist on the landscape over the long-term.</p> <p>The screengrab [provided in reply] shows the location of the branch road corridor known as Rocky Road. Rocky Road will plan to utilize as much of the previously existing road as possible before accessing the far east unharvested allocations.</p> <p>Further south of the allocations accessed by Rocky Road, there is also previous harvest in the Collins Lake Area. By completing harvest in this area in the upcoming FMP, we will be creating a large landscape patch which will consist of forest that ranges from 1-15 years old, and which will resemble the type of disturbance that a stand-replacing wildfire would naturally, in terms of forest structure and composition. The intent is that this area would be fully regenerated and be unavailable for forestry operations for 80+ years. Our forest management policy directs us to emulate the effects that wildfire has on the landscape during forest management and operations.</p> <p>For these reasons, among others, the Planning Team believes that the completion of harvest in this area for this 10-year FMP best balances all the social, economic, and environmental objectives for the FMP.</p> <p>In summary, forest management plan objectives related to woodland caribou are very important and were considered by the Planning Team. As previously stated above, unlike the D'Alton and Hollingsworth options, there are no caribou nursery areas present in the Rocky Road area that can receive associated AOC prescriptions or further planning considerations.</p>

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				<p>caribou and other uncommon wildlife). A significant percentage of our clients begin or end there trips there, despite the 1.5 hour long brutal and expensive truck ride. However, already the canoeing capacity of the Boiling Sand is fast approaching overuse. Hopefully park planning will eventually address those concerns. Winter roads and winter harvesting could maintain the quality of the canoeing experience. There has been significant resistance to winter roads/harvesting by the forest company. The Boiling Sand will be virtually unusable by canoeists and canoe outfitters for the duration of the period of non-winter road building, usage. This will be a significant financial loss to our company. Provincial land use policy under CLUPA #2616 is clear: wherever possible conflicts between logging and remote tourism must be decided in favour of commercial tourism.</p> <p>The Crown Forest Sustainability Act directs the Minister and their ministry to not sign any FMP that cannot be shown to be sustainable for all forest values. It would appear that the only option for the proposed Rocky Road and associated harvesting that is sustainable for ALL values is a 10 year deferral until the 2033-43 plan.</p> <p>I am attaching a sustainability table.</p>		