



April 29, 2021

Svetlana Zeran, General Manager
Bancroft Minden Forest Company
27578 Highway 62 S. RR #1
Bancroft, Ontario K0L 1C0

Dear Ms. Zeran,

Re: Request for moratorium on logging activities around Jack Lake in Bancroft-Minden Forest Company (BMFC) 2021-2031 Forest Management Plan (FMP)

On behalf of Ontario Nature, I am writing to express our opposition to the proposed forestry activities surrounding Jack Lake in blocks 1100 and 3222 as set out in the Bancroft-Minden Forest Company's (BMFC) 2021-2031 Forest Management Plan (FMP). We support the arguments presented by the Jack's Lake Association Environment Committee (JLA) in its October 15, 2020 submission to Corrine Arthur, at the Ministry of Natural Resources and Forestry (MNRF). Due to the significant ecological and cultural importance of this area to local communities, including Hiawatha First Nation and Curve Lake First Nation, we ask that you do your utmost to ensure that forestry activities near Jack Lake do not proceed.

Ontario Nature is a charitable conservation organization that protects wild species and wild spaces across the province through conservation, education and public engagement. Established in 1931, we represent more than 150 member groups and over 30,000 members and supporters across Ontario.

For the past three years, Ontario Nature has been working with conservation organizations and Indigenous colleagues in south-central Ontario to identify places of local importance that communities would like to see protected from industrial activity. The unceded/Crown land adjacent to Jack Lake emerged as a high priority for protection, based on their input and subsequent GIS analysis by Ontario Nature. The area has been used by Anishinaabeg peoples for thousands of years. They value these lands not only for hunting and trapping, but also for their resources (trees, fibres) and importantly for their wetlands, where many culturally significant medicinal plants are harvested. There have been and continue to be many archeological discoveries in and around the area, including petroglyphs observed by Indigenous hunters and trappers. Further study is needed to identify and protect culturally and historically significant locations in this area.

The JLA has thoroughly documented the unique features of the Jack Lake area, including habitat for at least 30 species at risk, Provincially Significant Wetlands, numerous unevaluated wetlands, and a diversity of fish species (lake trout, walleye, muskellunge) and fish habitats (cold water, cool water and warm water). Jack Lake is also a significant reservoir lake for the Trent Severn Waterway. Preserving intact forests is essential to sustaining the health and

214 King Street West, Suite 612, Toronto, ON M5H 3S6
T/ 416-444-8419 1-800-440-2366 F/ 416-444-9866
info@ontarionature.org ontarionature.org



integrity of these features, maintaining water quality and quantity, and enhancing resilience to climate change impacts (e.g., flooding, drought, forest fires).

We share the concerns of the JLA regarding increased mercury mobilization due to logging. Dr. David Lean, a world-renowned expert in eco-toxicology, has identified serious concerns in this regard. Given that Jack Lake's fish already have consumption restrictions due to elevated mercury levels, and that adverse impacts from mercury on the reproduction of walleye and common loons have already been observed, caution is warranted to properly address this issue, identified as a "key uncertainty" in MNR's Stand and Site Guide.

For the reasons outlined above, we urge the Bancroft Minden Forest Company to instate a moratorium on all forestry activities around Jack Lake (blocks 1100 and 3222). The area should be treated as a candidate protected area, off-limits to industrial activity pending further study and consultation, including with local First Nations, to determine whether it should be permanently protected.

Thank you for your attention.

Yours truly,

A handwritten signature in black ink that reads "Anne Bell". The signature is fluid and cursive.

Dr. Anne Bell
Director of Conservation and Education
anneb@ontarionature.org