



BIIGTIGONG
NISHNAABEG

Jan. 19, 2026

To: Jodi Hall, Forester, Forest Management Guides, jodi.hall@ontario.ca
Jennifer Nielson, Forest Landscape Ecologist, jennifer.nielson@ontario.ca

To the Attention of Jodi Hall and Jennifer Nielson with the Forest Management Policy Section of the Ontario Ministry of Natural Resources,

Re: Biigtigong Nishnaabeg Comments on (1) the Proposed Revisions to the Forest Management Guide for Conserving Biodiversity at the Stand and Site Scales and (2) the Proposed Revisions to the Forest Management Guide for Boreal Landscapes and Forest Management Guide for Great Lakes-St. Lawrence Landscapes.

Enclosed please find the response of Biigtigong Nishnaabeg (formerly the Ojibways of Pic River First Nation) to the Ministry of Natural Resources' (MNR) proposal noted above, as posted on the Environmental Registry of Ontario (ERO posting <https://ero.ontario.ca/notice/019-9217> and <https://ero.ontario.ca/notice/025-0847>).

Biigtigong Nishnaabeg understands that Ontario is seeking feedback on proposed revisions the Forest Management Guide for Conserving Biodiversity at the Stand and Site Scales (Stand and Site Guide) and that the proposed revisions are intended to address recommendations from the guide review and incorporate the latest science, practitioner experience, Indigenous knowledge, and community perspectives. Biigtigong Nishnaabeg also understands that Ontario is seeking feedback on proposed revisions to the Forest Management Guide for Boreal Landscapes and Forest Management Guide for Great Lakes-St. Lawrence Landscapes and that the revisions aim to modernize the guides and align with changes to policy and legislation while continuing to provide for the sustainability of Ontario's forests.

The attached **Comment Disposition Tables #1 (Stand and Site Scales) and #2 (Landscapes Guide)** outline Biigtigong Nishnaabeg's review, comments, concerns and required next steps with respect to the proposals. In general, we believe closer collaboration with Biigtigong Nishnaabeg – and other First Nations – in the management and regulation of forests would produce stronger, more holistic and effective outcomes for species and the preservation of biodiversity.

Please note that while we are providing comments on Ontario's proposals, we would also like to reiterate once again to the Government of Ontario the following with respect to actions undertaken within Biigtigong Nishnaabeg's territory:

1. Biigtigong Nishnaabeg is not a signatory to the Robinson Superior Treaty of 1850 and has filed a claim for Aboriginal Title in the Ontario Superior Court of Justice (court file no. CV-07-018). Biigtigong

Nishnaabeg is currently in settlement negotiations with both Canada and Ontario regarding this claim. By asserting Aboriginal Title, Biigtigong Nishnaabeg has given notice to the Crown that it has never ceded its lands, or agreed to share its lands, through the signing of a treaty.

2. In light of Biigtigong Nishnaabeg's asserted Aboriginal Title and the ongoing settlement negotiations, Biigtigong Nishnaabeg is owed a heightened Duty to Consult by the Crown on any and all activities within Biigtigong Nishnaabeg's exclusive Aboriginal Title territory. Failure by the Crown to address our stated concerns with respect to how the changes contemplated impact our Aboriginal Title rights is viewed by Biigtigong Nishnaabeg as a failure of the Crown to adequately fulfill the Duty to Consult. Such failures further erode provincial treaty implementation, and undermine efforts with respect to collaborative management, decision-making and environmental stewardship.

I look forward to your response to this correspondence.

With Respect,



Juanita Starr, Director, Sustainable Development, Biigtigong Nishnaabeg

Cc: JoAnne Michano, Band Manager, Biigtigong Nishnaabeg, joanne.michano@picriver.com
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<p>Comment Disposition Table #1:</p> <p>Biigtigong Nishnaabeg's Comments on ERO posting 019-9217 being "<u>Revisions to the Forest Management Guide for Conserving Biodiversity at the Stand and Site Scales (the Stand and Site Guide)</u>"</p> <p>Issue:</p>	<p>Solution/Comments:</p>
<p>Overarching comment under which all subsequent comments flow: Forests and the species that depend on them are central to the exercise of First Nations rights, as articulated in and protected by Section 35 of the <i>Constitution Act, 1982</i> and by way of various treaties. Forests provide for the exercise of hunting, fishing, trapping and harvesting rights. Cultural and ceremonial rights and practices are carried out in and are dependent upon forest landscapes. Forests have been vital not only for historical or traditional use, but are also integral to the current use of lands and resources for the exercise of the rights of First Nations. Any and all forest management efforts, policies or laws will have an impact on First Nations rights. Any and all efforts, policies or laws or proposed changes to such will require deep and meaningful consultation with First Nations, in the spirit of the United Nations Declaration on the Rights of Indigenous Peoples and with the objective of fulfilling requirements for Free, Prior and Informed Consent.</p>	
<p>Indigenous Input: The Revised Guide refers to Indigenous Peoples' input in several places and the manner in which the input has been taken into account. However, there is no summary of the input, nor how the input affected the guidance contained in the Guide. Such a summary should highlight the impact of Indigenous knowledge and values and how it helped to shape the direction in the guide.</p>	<p>Produce a summary of Indigenous consultations and Indigenous input into the guide and how the input affected the Guide's requirements.</p>
<p>Review and change schedule: As noted on p. 2 of the 'Proposed Revisions' document, a Forest Management Guide review is required every ten years. Although a review was conducted in 2015, and over 100 recommendations made, these are only now (10 years after the review) being brought into the Stand and Site Guide (SSG). Why has it taken 10 years to implement suggested changes and recommendations made in 2015?</p>	<p>MNR should commit to a more expeditious implementation of recommendations going forward.</p>
<p>Climate Change: The previous (2010) version of the SSG did not take climate change into account in any of its prescriptions or requirements. The revised version of the Guide takes climate change into account in several ways, including: the Guide has added flexibility into key prescriptions to allow forest managers to adapt their practices to unanticipated outcomes of climate change; prescriptions for moose habitat have been revised so as to provide a mechanism of relief from heat stress; caution is added to riparian management requirements so as to attempt to ensure that thermal impacts on water temperature will not occur as a result of cover management in riparian zones; direction for management of roads and road surfaces has been improved so as to account for winter thawing. Other direction has been modified to provide discretion to forest managers based on possible impacts of climate change include changes in timing of fish reproductive periods, protection of woodland pools, use of local knowledge related to changes in timing of bird breeding; minimization/avoidance of site disturbance related to winter thaws, etc.</p>	<p>MNR has done a good job of adding considerations to the guide related to potential impacts of climate change.</p>

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<p>Exceptions: The new version of the SSG brings the topic of exceptions to specific standards or guidelines. This topic is also addressed in the Forest Management Planning Manual. The SSG does not include the requirement for notifying or consulting with First Nations as to whether they have any concerns associated with the exceptions or if the exceptions may impact upon rights.</p>	<p>Modify the guide so that it directs planners to consult First Nations on the planned exceptions and address their concerns. This may be handled through consultation on annual work schedules (AWSs), but the existence of exceptions should be made clear to First Nations in requests for comments on AWSs.</p>
<p>White-tailed Deer: The Guide addresses stand-level management of white-tailed deer over the several pages. The Guide should also clearly state that deer habitat is not to be fostered in boreal forests. Deer presence can upset moose and caribou populations by spread of <i>P. tenuis</i> and by increasing density of wolves.</p>	<p>Revise the Guide so as to clarify/stress that deer habitat is not to be fostered in the boreal forest.</p>
<p>Caribou: Caribou are a species of cultural importance to Biigtigong. The Guide notes, correctly, that caribou respond to habitat composition and structure at large scales. However, stand-scale features can also be important. The Guide should recognize the importance of islands suitable for caribou habitat (in caribou range), and the value of old-conifer dominated stands, and, in-context, should require protection of such sites and features. These characteristics are discussed in the Landscape Guide but should be noted in the SSG too.</p>	<p>Identify and protect appropriate management of sites of potential importance to caribou.</p>
<p>Areas of Concern (AOC): The Guide has been clarified to explain that when AOC's overlap, the most restrictive direction is not required to be followed – exceptions may be developed. While it is logical that an individual AOC prescription be developed where overlaps occur, the bar for the prescription should be that no value is subject to lesser protection than if the overlap did not exist.</p>	<p>Revise direction in Section 4.0 so that when values overlap, no degradation of protective prescriptions is permitted.</p>
<p>Living trees along shorelines: Within shoreline AOCs, the direction for retention of wildlife trees in harvest areas will require the retention of at least 20 trees per 100 m of shoreline. This is double the amount previously required. This is consistent with Indigenous community concerns.</p>	<p>Revision is consistent with improved management practice.</p>
<p>Trees at the Northern limit of their range: The importance of managing species at the northern edge of their range is recognized in the Landscape Guide; it should be included in the SSG too. Individuals at the northern edge of species' ranges will be important in adapting to climate change.</p>	<p>Revision would be important to incorporate in SSG as well as Landscape Guide.</p>
<p>Prescriptions for water features with moderate sensitivity: The 2010 SSG included prescriptions for standing waters of three classes of sensitivity: low, moderate, and high. The revised SSG includes only two sensitivity classifications (low and high). The proposed 2025 approach lacks the nuance for ecological 'middle-ground' ponds. However, the new approach</p>	<p>Implement a monitoring project to ensure that there are no ecological shortcomings associated with the revised approach.</p>

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seems to have a more precautionary baseline for protection through the use of AOCs for all water bodies. The 2010 approach was more multi-factor, whereas the 2025 approach is based entirely on fish presence and connectivity. The new approach has a lower planning burden. The new approach seems to expand the regulated shoreline area and increase operational constraints.	
Provincially Significant Wetlands: Revised approach permits an "acceptable loss" of natural features or ecological functions that makes individual wetlands significant. Development of prescriptions for individual wetlands in Appendix 4.1a seems reasonable, but the intent seems to be watering down of existing protections associated with provincially significant wetlands.	Acceptance of degradation of wetlands is not sound ecological management. This change is not reasonable and needs to be revised.
Turtles: The revised Guide has removed direction that restricts use of roads in snake and turtle direction, because forest access roads are public roads and restricting road use to only a portion of the users was not considered effective. All eight native species of turtles in Ontario are classified as Species AT Risk (SAR).	While restricting use of roads may not be practical, educational and conservation-oriented signage should be implemented along high-use roads.
Road Reclamation/Closure – Best Management Practices (BMPs): BMPs for road management continue to include practices which are generally ineffective, such as signage, gates, seasonal closure.	These techniques are generally known to be ineffective and should be removed from the options available to forest managers. Vigorous road reclamation or intensive physical barriers are the only truly effective measures.
Species at Risk (SAR): Measures associated with the new Species Conservation Act (SCA) are not addressed in the SSG; this is understandable as the Act is not yet in force. However, the 'registration first' approach and generally weakened approach to dealing with species at risk is a very significant concern. The extent to which the SCA will impact stand-level management measures associated with forest management is not yet clear. However, given the general tenor of the act there is cause for concern.	Produce a comprehensive assessment of the impact of implementation of the SCA on species at risk in the Area of the Undertaking and revise the Guide so that appropriate measures are in place to continue strong protection approaches.
Cultural values: The SSG does not address cultural values and some direction that did so in the previous version of the SSG has been removed (i.e. protection of trails, portages, etc.) The SSG directs the user to the Forest Management Guide for Cultural Heritage Values. This guide was published in 2007 and should have been reviewed nine years ago. The guide is overdue for a significant revision.	Begin the review of the Forest Management Guide for Cultural Heritage Values.
Biofibre Harvest (Section 6.2): This section should state that biofibre harvest should prioritize the harvest of biofibre from blocks that also yield veneer, sawlogs, and pulpwood, and that the harvest	This section should state that biofibre harvest should prioritize the harvest of

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of blocks that yield only biofibre should be avoided. Alternately, biofibre harvest could be part of an explicitly defined restoration strategy, that would remove off-site, low quality and low stocking stands so they could be renewed to create a forest that is appropriate for the site, of higher quality and more productive.	biofibre from blocks that also yield veneer, sawlogs, and pulpwood, and that the harvest of blocks that yield only biofibre should be avoided.
Salvage Harvest (Section 6.1): This section does not differentiate between live and dead trees. In many areas that are eligible for harvest, the natural disturbance leaves live trees – sometimes in pockets and sometimes individually. The direction for retention should balance the retention of live and dead trees of a range of species. In addition to the 25 retained trees/ha, salvage harvesting should also be required to leave patches of trees (live or dead) to improve the habitat left after salvage harvesting is completed	The direction for retention during salvage harvesting should balance the retention of live and dead trees and provide for retention of a range of species. Salvage harvesting should also be required to leave patches of trees (live or dead) to improve the habitat left after salvage harvesting is completed.

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Overarching comment under which all subsequent comments flow: Forests and the species that depend on them are central to the exercise of First Nations rights, as articulated in and protected by Section 35 of the <i>Constitution Act, 1982</i> and by way of various treaties. Forests provide for the exercise of hunting, fishing, trapping and harvesting rights. Cultural and ceremonial rights and practices are carried out in and are dependent upon forest landscapes. Forests have been vital not only for historical or traditional use, but are also integral to the current use of lands and resources for the exercise of the rights of First Nations. Any and all forest management efforts, policies or laws will have an impact on First Nations rights. Any and all efforts, policies or laws or proposed changes to such will require deep and meaningful consultation with First Nations, in the spirit of the United Nations Declaration on the Rights of Indigenous Peoples and with the objective of fulfilling requirements for Free, Prior and Informed Consent.	
Note: Biigtigong's Title Area is predominantly in Landscape Guide Region 3W, with the portion of the Title Area in the White River Forest lying within Landscape Guide Region 3E.	

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<p>Indigenous Input: Acknowledgements in the draft Guide recognize the input of First Nations and Indigenous communities in its development. However, there is no summary of the input nor how the input affected guidance contained in the Guide. Such a summary should highlight the impact of Indigenous knowledge and values and how it helped shape the guide.</p>	<p>Produce a summary of Indigenous consultations and Indigenous input into the guide and how the input affected the Guide’s requirements.</p>
<p>Contextual Issue: One of the fundamental weaknesses of Ontario’s forest management planning process is that the planned harvests are invariably set at or slightly below the calculated Available Harvest Area (AHA) (the Ontario equivalent of the AAC). This is done even when the actual harvests are well below the AAC and have been for many years. As a result, there is little likelihood of achieving all of the targets and plan objectives. All of the science that backs up the landscape guide and the effort by planning teams to implement the guide’s requirements is effectively wasted. The Forest Management Planning Manual (FMPM) is where direction is provided regarding setting the planned harvest – this is mainly a comment on the effectiveness of Forest Management Plans (FMPs) in meeting the landscape level goals and targets.</p>	<p>In the FMPM, require the planning teams to set the planned harvest at a level within 20% of the average over the last five years, unless an identifiable catalyst is present.</p>
<p>Climate Change: The draft Landscape Guide discusses climate change however it stops short of discussing how forest managers could consider and respond to it at the landscape level. The document assumes that maintaining diversity is a sufficient strategy for providing resilience. Climate change can be expected to increase wildfire activity and cause added stress on forests, making them more vulnerable to pests and disease. Climate change should also begin to trigger adjustments to habitat management; some suggestions are provided in the SSG but not carried over into the landscape guides. The trees growing at the northern boundaries of their ranges are also of greater importance as they are likely more capable, genetically, of leading range shifts triggered by climate change. Special attention should be paid to these northern stands and trees in both the Landscape Guides and the SSG.</p>	<p>The landscape guide provides negligible direction regarding climate change. The SSG includes some modifications to respond to climate change however these are not carried over into the landscape guides, when they should be. For example, the adjustments recommended to the provision of moose summer and winter habitat span both the landscape and stand levels and the guides should be harmonized in this respect.</p> <p>There is a similar issue with respect to tree species at the northern limit of their ranges. Forest managers should be required to map and retain stands that contain tree species at the northern limit of their ranges. There should be</p>

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	<p>measures to conserve these trees and stands in both the SSG and the landscape guide.</p> <p>Landscape management should also take into account and seek to modify the susceptibility to fire spread on a landscape. For example, maintaining or establishing buffers of hardwood stands (especially young stands) that could limit the advance of wildfire should be considered.</p>
<p>The use of the Natural Range Variability (NRV) as direction: The Landscape Guide notes that the average temperature in Ontario has risen 1.4 degrees C above pre-industrial levels. The fire regime is more active in northwestern Ontario, and likely to be so in north-central and northeastern Ontario as well. Given this, managing the forest to arrive at a pre-industrial forest condition no longer makes sense, and planning teams should be able to adjust landscape level targets and objectives appropriately. It is also likely that there will be less old forest in future, and greater emphasis should be placed on protecting what remains, especially for commercially desirable forest types which generally have very little remaining old forest.</p>	<p>Modify the landscape level targets.</p>
<p>Red and White Pine: Direction in Ontario's Old Growth Policy for Crown Forests states that forest management will maintain "no less than the 1995 amount (in hectares) of red and white pine while permitting a sustainable harvest ...". This direction was incorporated into the target-setting requirements in the 2014 Boreal Landscape Guide but has been watered down in the draft Boreal Landscape Guide to state that "Forest management plans will reference the 1995 amount of red and white pine forest when assessing the achievement of the red and white pine indicator". This revision indicates that it is acceptable to fail to meet the Old Growth guide direction. Forest managers may still include the Old Growth Policy goal for red and white pine in their FMP's, but the new wording indicates that there is no non-compliance if the amount of red and white falls below the 1995 levels. This is contrary to the Old Growth Policy.</p>	<p>Retain the original wording in the Boreal Landscape Guide; i.e. that "forest management teams will develop targets to ensure that this indicator does not drop below the 1995 amount (the total number of hectares)".</p>

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<p>Caribou and Discontinuous Zone: Caribou are a species of cultural importance to Biigtigong. The Guide does not provide any management direction for caribou habitat in the Discontinuous Zone. This zone is large and much of it is available for forest operations; the zone also has the potential to be important for caribou even though it may not be continuously used by caribou. Caribou is a priority animal for Biigtigong and Biigtigong’s Title Area is a combination of Lake Superior Coastal Range and Discontinuous Zone.</p>	<p>MNR should continue working with Biigtigong to develop a management approach for the Discontinuous Zone.</p>
<p>Caribou: Caribou are a species of cultural importance to Biigtigong. Section 3.1.3.2 of the Guide describes the caribou habitat texture indicators, and notes that texture is related to the connectivity of habitat. Yet texture by itself does not measure connectivity and may be poorly correlated with connectivity.</p>	<p>The planning teams need to be directed to visually consider connectivity of caribou habitat, with the objective to maintain or increase it.</p>
<p>Caribou: Caribou are a species of cultural importance to Biigtigong. We have observed the gradually diminishing size of caribou blocks in the northern ranges (i.e. smaller blocks are appropriate in the Lake Superior Coastal Range). The original direction for laying out a Dynamic Caribou Habitat Schedule (DCHS) was to create blocks that were 10,000 – 15,000 ha. In many current plans, blocks are considerably smaller, and there is no scientific justification for this. Direction #37 just talks about large contiguous tracts – no guidance is given regarding block size. Biigtigong is concerned that smaller blocks degrade the effectiveness of Ontario’s caribou management approach.</p>	<p>The landscape guide should specify that caribou blocks in the northern ranges should be 10,000 – 15,000 ha in size, as per the direction in the Caribou management strategy.</p>
<p>Caribou Habitat Management: NOTE – Caribou are a species of cultural importance to Biigtigong. Caribou habitat management in the guide is complex, and a real assessment of its likelihood of success and improvements/changes from the 2014 guide to the present draft would take considerably more time that is available for this assessment: In brief, however, we note the following:</p> <ul style="list-style-type: none"> • The 2025 guide seems to provide improvement in requirements for caribou habitat management by requiring explicit milestones and documentation of when desired caribou conditions will be reached (vs generally ‘moving toward’ a Simulated Range of Natural Variation (SRNV) as required in the 2014 version of the guide); • Use of the DCHS is a harder requirement, and planners must show how year-round habitat is maintained. • The 2025 guide explicitly links roads to caribou risk whereas their risk was not as explicitly recognized in the earlier version of the guide, however it’s not really clear how road retirement is addressed 	<p>Undertake quantitative real-world-based assessment of likelihood of success of caribou management.</p> <p>The planning teams need to be directed to visually consider connectivity of caribou habitat, with the objective to maintain or increase it.</p> <p>Require justification for planning DCHS blocks of smaller than some reasonable milestone (e.g. 5,000 ha).</p>

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<ul style="list-style-type: none"> • The timeline for reporting on simulated caribou habitat targets is 40, 60, and 80 years. Milestones are good, but it's not clear whether a decline in habitat (and therefore population) at those milestones is acceptable. • The dynamic of apparent competition, which is a critical in woodland caribou decline is not explicitly addressed. • There are many existing examples of DCHS blocks being considerably smaller than the 10-15,000 ha range that originally justified their use. Smaller blocks may be the rule rather than the exception now. The guide needs to emphasize the use of appropriate-sized blocks. • Unclear how road retirement is facilitated. • Section 3.1.3.2 of the guide describes the caribou habitat texture indicators, and notes that texture is related to the connectivity of habitat. Yet texture by itself does not measure connectivity and may be poorly correlated with connectivity. 	Require mean size of DCHS blocks to exceed some reasonable milestone (e.g. 7,500 ha).
White-tailed Deer: The landscape guide contains a considerable amount of direction on deer management. This is appropriate as deer are an important species in the Great Lakes Forest Region. With climate change it is likely that deer will continue their northward ranged expansion, which will be to the significant detriment of caribou and moose. The guide should address the potential for northward deer expansion, increased predator densities and apparent competition dynamics. This is a challenging circumstance, but the lack of any attention to it gives the impression that the MNR considers it a forgone conclusion.	Develop policy and a related implementation strategy regarding northward extension of deer range.
Milestones: The requirement that the landscape indicator milestones be reviewed and revised regularly, and it is not specified who undertakes this review and revision – it may be the planning team. The concern is that with different planning teams reviewing and potentially revising the milestones, a range of stringencies may be introduced. In particular, there is concern that a planning team may weaken the milestones to make their achievement less onerous and less impactful on harvest levels /timber cost.	MNR provincial or regional staff should oversee the milestone review and revision process.
Large Landscape Patches (LLP): The concept of LLP is introduced in the boreal landscape guide. It is noted that LLPs are only mentioned in passing in the FMPM. This is a situation where greater direction and integration would be helpful. It is not clear how or why LLPs are to be selected, whether the entire management unit is to be sub-divided into LLPs, etc.	Provide a better explanation of the role and manner of selection of LLPs.
Traplines: The concentration of harvesting in traplines can have a devastating effect on furbearers and trappers. Recognizing trapline boundaries in planning and limiting the percentage of a trapline	Recognize traplines in planning and ensure that no more than 25% of trapline

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that can be cut within a 20-year period would help to maintain a distribution of furbearers and maintain the viability of individual traplines.	area can be harvested in a 20-year period.
Cumulative Effects: Are not considered and they need to be in order to make forest management more effective. The high and increasing amount of development requires that cumulative effects be considered.	Consider cumulative effects in objective setting.
Indigenous Waterways: The major rivers are central to the identity of Biigtigong and to the health of the community. Biigtigong has advocated that a 1-kilometer-wide reserve be created on either shore of key rivers in the Pic Forest, including the Pic, Little Pic, Black, White Otter and Steele Rivers. These are landscape level reserves and should be recognized in the Landscape Guide. The Forest Management Guide for Cultural Heritage Values recognizes point values, omitting landscape-level values of cultural importance.	The Landscape Guides should allow provisions for special management or protection of large culturally important areas.