

# Response to the Draft Newfoundland and Labrador Sustainable Forest Management Strategy

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**Introduction:** The following response is a collaborative effort of several ENGOs, an aboriginal group, and concerned individuals from Newfoundland and Labrador. It presents comments, omissions, and recommendations to the *Newfoundland and Labrador Sustainable Forest Management Strategy: Draft (SFMS)* that was release for a 60-day public consideration process on June 2, 2003.

## 1 **Laudable general directions in the draft strategy and suggested improvements to key strategic directions**

***Improvements to the public and stakeholder consultations process.*** We are encouraged by the Newfoundland Forest Service's (NFS) commitment to improve the process in the next five years, and look forward to working with NFS to offer practical suggestions for how this can best be done. We appreciate the recognition that the public and stakeholder consultation should take place at the front end of the planning process, rather than only after decisions are taken. This same approach should be followed in obtaining public and stakeholder input on provincial forest policy initiatives, revisions to the ecosystem-based management guidelines, proposals to revise the planning framework, etc.

***Recommendation 1:*** A 'front end' consultation process where NGOs, aboriginal groups, and the general public are included should be applied to all aspects of policy development.

***Objective value measurement (other than timber and fiber).*** There have been attempts made to incorporate alternate values into the SFMS, general forest management, and the 5-year planning processes. Although efforts have been made to attach tangible measurements to these values, the SFMS does not adequately deal with the lack of measurable, objective methods of evaluating values other than timber and fiber supply. Once the values have been identified for the forest, these values must be given some objective measure. The strategy does emphasize one measurable value – the annual allowable cut. It is obvious that the calculation of the AAC has attained a level of professional sophistication. It is important to recognize, however, that no other value is given a measure of objectivity akin to that for the annual allowable cut. The AAC is presented in terms of cubic metres (or board feet). It is a measure of the identified value of wood production. It is quantified, technically determined, measured and accounted for. Other forest values, once identified, must be described in a similar fashion. Lack of knowledge does not currently allow for the same level of sophistication that we find in the calculation of the AAC, but some reasonable attempts must be made. For non-quantifiable values, such as spiritual values, wilderness values, etc., other forms of assessment must be developed.

For each identified value, one must pose the following questions:

- What level for each value?
- What spatial distribution for each value?
- What temporal distribution for each value?
- What tradeoff rules are acceptable in the event of conflict among values?

Until we have some measure of what we want, where we want it, and when we want it, then we are far from managing the forest. Industrial forestry has clearly identified, measurable objectives expressed in annual mill requirements of cubic metres or board feet. This is the only value that is given clear and univocal expression. The timber supply analysis is carried out to meet that value. All other forest activity is viewed in relation to this well-defined value.

*Recommendation 2: Quantified, objective measurements equivalent to the AAC should be developed for non-timber and non-fiber values.*

**Biodiversity values: where are the measures in space and time?** The concerted, directed movement towards biodiversity-based, forest ecosystem management should be applauded and the Biodiversity Assessment Project is also welcome news. If this commitment to biodiversity is not to remain just simply a grand notion, then efforts must be made in the development of some objective measures of these biodiversity values. Unless some reasonable objective measure can be made of what you want in the forest - be it marten, caribou, protected areas, natural disturbance processes, wilderness, beetles or clean water - there will be no way to judge the efficacy of the activities detailed in the 5-year operating plan. Management will be impossible unless a reasonable, objective measure for each value, and the spatial and temporal distribution of such values can be determined. We feel that this value deserves special attention and therefore make *Recommendation 3* in addition to the above recommendation concerning values.

*Recommendation 3: Quantified, objective measurements should be developed for biodiversity values in order to ensure efficacy of the SFMS.*

**Labrador planning process.** We believe that there are two issues regarding Labrador that are vital to the SFMS and must be dealt with accordingly. The first is the planning process that has been undertaken in District 19 and the second is the way which the NFS views Labrador as a source of wood for the Island portion of the province.

We recognize the progress that has been made in forest management in Labrador, especially through the partnership agreement with the Innu Nation. We believe that the partnership agreement with the Labrador Métis Nation will also result in positive benefits for the environment as well as all citizens of Newfoundland and Labrador. Furthermore, there is tremendous potential for the lessons that have been learned through the District 19 planning process to be transferred to forest management districts across the province. The improvements that have been made in the planning process in Labrador should

provide a leadership example to benefit forest management planning processes throughout Newfoundland and Labrador.

The foundation and starting point for District 19A planning was the designation of an ecological protected area network at the landscape, watershed and stand levels. Annual allowable cut calculations and cut block selection were secondary considerations. We view this “conservation first” approach as a significant, positive shift in forest planning in this province. Unfortunately, the SFM plan makes no explicit commitment to duplicating this approach in all other districts in the province. We request that this planning approach, which gives planning priority to protected area selection, be more explicitly described within the SFM. We also request clarification on what legislative mechanism(s) will be used to uphold protection measures for the designated protected areas within forest districts, such as 19A, where this approach is applied.

That being said, there are problems with the outlook to development of Labrador’s forests. Despite the absence of forest development data, an updated inventory, growth and yield data, any protected areas policy, and any baseline biodiversity and forest classification data (other than that carried out under the agreement with the Innu Nation), the strategy focuses solely on industrial forest exploitation. Actual mention is made regarding the location of sawmilling facilities, wharf and storage facilities, and the need for bridges and major new road systems throughout Labrador (p. 81). No mention is made of the study area for the proposed Mealy Mountains National Park, nor of the need for other protected areas. How can other forest values find a voice, when concrete objectives such as wood-processing and transport infrastructure are already in a dominant position in the forest plan?

With regard to the economic implications of forestry in Labrador, there is an overwhelming feeling within the Labrador population that the management strategies taken by the province are geared toward improving the status of the forest industry on the Island. Labrador appears to be part of a list of sources for Newfoundland’s wood supplies. This is unacceptable if the NFS’s goals are to encourage sustainable social relations with regard to forestry practices in this area. Various organizations in Labrador, including The Third Signatory have advocated for a locally controlled forest industry with benefits going to local people. Labrador is at the dawn of a new era in sustainable forestry and Labrador residents do not wish to have their forests considered to be a “primary source” of fiber for the Island.

Due to the unique nature of Labrador’s forest situation, we advocate a “Made in Labrador” strategy for Labrador’s wood resource. The resources in Labrador cannot be seen as part of the balance of the Island’s fiber supply until a “Made in Labrador” economic strategy is devised. We believe the initial step in devising this strategy is to set up a local Forest Advisory Council about forest industry and as of yet the Department of Forest Resources and Agrifoods have not supported this initiative.

*Recommendation 4: The SFMS should include the commitment that lessons learned through the District 19 planning process will be applied to future forest planning. Efforts in relationship development, such as those made with the Innu Nation should be made with the Métis Nation and ecological-based planning should be applied to all districts.*

*Recommendation 5: Social and economic commitments made regarding Labrador must be upheld and the SFMS must recognize the unique situation of that area of the province. Therefore, a great deal of work must be done by the DFRA to ensure that all the social, economic and environmental objectives surrounding Labrador issues are addressed. We recommend the establishment of a Forest Advisory Council made up of local NGO, aboriginal group, and community representatives.*

**Calculations of Annual Allowable Cut levels.** There have been significant improvements in recent years to how AAC levels are determined and set, particularly in FMD19. This is the first example we know of in the province that lives up to the commitment in the National Forest Strategy to set harvest levels as an outcome of the planning process (rather than as an input to the planning process). While the draft provincial strategy includes a commitment to include public input in setting AAC levels, it is important to provide more detail on how this will be done, since past experience has not shown this to be the case.

While we appreciate the efforts by NFS to have their AAC calculations reviewed by independent experts, these experts are incapable of judging the extent to which public concerns are reflected in the AAC assumptions.

We are also concerned with the assertion (p.41) that AACs may be revised on the basis of improved management practices. What public scrutiny will there be of these claims? We therefore recommend that NFS establish a public review team to review the assumptions used to drive or revise the AAC calculations.

*Recommendation 6: Setting AACs as the outcome of the planning process is imperative to good ecosystem management and should be applied across the board for all districts. It should also be combined with adequate public scrutiny. We recommend a mandatory review period of 30 days for assumptions to be used in models designed to construct AAC's and a compulsory review period after the AAC's have been proposed by DFRA.*

**Objectives for conserving old forests.** The introduction of objectives for maintaining old forests (p.39) is a notable and important achievement. It is stated that 15-20 % of the older forest in each district is not permitted to be harvested. While this is a significant first step in the promotion of biodiversity values associated with old forests, this objective needs to be detailed. What is meant by “old forest”? What are the spatial and temporal distributions of this forest? How does this policy relate to “primary old forest” versus “managed old forest”? Will this old forest be allowed to continue through to stand break up or will it be available for harvesting at a certain age? How does this old forest policy relate to an old-growth policy? They are not necessarily equivalent. The strategy should deal clearly with these issues and demonstrate that the province has mechanisms in place to explore these

issues further. In many cases, a focus on stand structural development, rather than chronological age, may be more fruitful for maintenance of values associated with “old” forests. It is best to view the notion of old forests within the context of forest disturbance regimes and not simply in terms of an ad-hoc percentage applied across the board.

This is why the commitment in the draft strategy, while a good beginning, is still insufficient to ensure that there is adequate conservation of the values associated with late seral stage forests. The use of 80 years as the threshold above which forests are considered “old” is too low for some regions of the province, especially the Great Northern Peninsula and Labrador. We recommend that the commitment in the strategy should embrace the progressive initiatives being taken elsewhere in the country, in particular in developing a National Boreal Standard for the Forest Stewardship Council. Although that standard is still in draft form, there are three critical components that are included

- The pre-industrial forest condition and disturbance regime is characterized, including a description of major disturbance factors, estimated mean distribution and/or composition of tree species and disturbances, average disturbance return interval and age class distribution, including full characterization of the age range of old forests and the range of natural variability (Indicator 6.3.5).
- Management strategies maintain average landscape and/or regional distributions of the full age-range of old forests identified through the analysis of pre-industrial condition (6.3.7), and do not attempt to mimic extreme events of low frequency (6.3.9)
- Management strategies seek to increase the abundance of forest units and communities that are close to or at the extreme bottom of the range of natural variability (Indicator 6.3.6).

The approach described above is more ecologically appropriate than setting a fixed target for the maintenance of old forests. The requirement to maintain old forests should also be listed as an action under Value 1.1 (Representative landscapes).

*Recommendation 7: The SFMS needs to incorporate the definitions of old growth forest under which the NLS is working as well as background info on how this issue is going to be dealt with on a structural and temporal basis. The NFS should look to the National Boreal Standard for the Forestry Stewardship Council to develop a method of old growth forest representation that is inclusive of all the values associated with old growth.*

**Revision of ecosystem-based management guidelines and planning framework.** We agree that the guidelines and planning framework should be reviewed and revised, in particular with a view to implementing the commitment in the National Forest Strategy to develop and implement field-level guidelines for practicing ecosystem-based management. The commitment to revise these guidelines (p.43-44) includes a list of the agencies to be involved in developing ecosystem-based management guidelines, including government and industry representatives, but no environmental NGO or community representatives. It is clearly not appropriate for industry representatives to participate in drafting these guidelines while conservation interests only have an opportunity to review the draft guidelines. It is extremely important that this imbalance be corrected. When the

guidelines were revised in 1993 NFS commissioned the Newfoundland and Labrador Environment Network to convene a workshop on the topic; we urge NFS to undertake a similar commitment for the current review. Furthermore, we recommend that NFS submit the revised ecosystem guidelines and planning framework for a full Class Assessment under the Environmental Assessment Act. This can be an effective way to “streamline” the planning process while ensuring that environmental values are adequately protected.

*Recommendation 8: As in Recommendation 1, there is a need for a ‘front end’ consultation process where NGOs, aboriginal groups, and the general public are included during the revision of the ecosystem-based management guidelines. These guidelines would then be submitted for a full Class Assessment under the EAA.*

**Protected Areas Connectivity.** Protected areas can rarely be large enough to meet the needs of migratory and wide-ranging animals. Conservation biologists therefore point to the importance of maintaining natural connections, or corridors, between core protected areas in order to ensure the survival of many plant and animal species. Reference is made to the development of “a protected areas network at the landscape and watershed levels” (page 44), but more detailed information should be provided. Is the NFS committing to the establishment of corridors between all proposed areas in the Natural Areas Plan? Does the NFS propose to establish protected area networks within each forest district? If so, with what legislation will the protection of these areas be guaranteed? Who would participate in the design of district level protected areas? We strongly encourage the NFS’s efforts to pursue protected area designation, as such areas are critical to maintaining ecological health of wildlife and natural ecosystems across the entire landscape.

*Recommendation 9: The details on the proposed protected areas network need elaboration in the plan and the NFS should continue to pursue protected area designation.*

**Criteria and Indicators.** The use of criteria and indicators of sustainable forest management certainly helps to focus attention on the various issues, but how the SFMS will be carried out is still very vague. Throughout the strategy, values, goals and indicators are missing for large sections. Even though Secondary and Value-added Manufacturing (p. 64-65) are considered valuable in the strategy, there are no specific values, goals or indicators associated with them. Appropriate and meaningful criteria and indicators should be developed for all sections of the SFMS if they are as important as timber and fiber values, which the NFS asserts they are. Detailed methods of how the NFS will carry out monitoring of these indicators should also be included.

*Recommendation 10: A “criteria and indicators” approach should be applied to the entire SFMS and more information on how these indicators will be measured should be provided.*

## 2 Missing elements that should be added to the strategy

***Integrated Land Use Planning.*** The need for integrated land use planning in Newfoundland and Labrador is widely recognized; for example in the Interdepartmental Review Committee on Land Use Policy and Planning (1994) and the Newfoundland and Labrador Round Table on the Environment and the Economy's *Framework for a Sustainable Development Strategy for Newfoundland and Labrador* (1995). Integrated land use planning would consider the full range of values that can be supported on the land, including extractive non-renewable resources, renewable resources, non-extractive resources and services. Despite years of discussion and consultation in the district-level forest planning teams, no set of agreed upon values are in place for the province's forests and mill wood requirements still remain the primary accepted value. Priorities would be determined in such a way as to support the best possible "mix" of sustainable uses and non-uses. The five-year management planning process is not a substitute for truly integrated land use planning, since in the five-year planning process uses other than logging are addressed as "constraints" to forestry operations. The 5-year plan considers cut levels, cutblock location, road construction, and silvicultural tending. These concrete measures are already well beyond the stage where values are identified. Non-industrial stakeholders can only tinker with an established, wood procurement plan.

Integrated land use planning is needed across the province, but is especially important in Labrador, where key decisions about forestry allocations have yet to be taken. NFS can help to support and initiate integrated land use planning in Labrador by committing to provisionally defer logging in large landscape-level forests until a credible conservation plan has been completed, including conservation design aspects, protected areas gap analysis and candidate area identification to fill gaps, special management areas, and appropriate consultation with all affected interests.

*Recommendation 11: The NFS should develop a credible conservation plan based on land use planning for the entire province and defer logging in Labrador until such a plan has been completed.*

***Measurable, objective linkages between the strategy document and lower level 5-year operating plans.*** The strategy document is supposed to "identify goals and objectives of forest management" whereas the 5-year operating plan identifies the actual cutblocks, the location and types of silvicultural stand tending and the location of forest access roads. The strategy document is supposed to provide vision or values that will, in turn, guide what will actually happen on the ground. However, the proposed strategy does not do that. Given the proposed strategy, the reader would not be able to judge if any 5-year operating plan was "good," "bad," or "indifferent." There are no agreed upon landscape-level series of values (except timber and fibre production) that would help one to either prepare an operating plan or to judge the efficacy of an operating plan.

*Recommendation 12: The NFS must develop a transparent system where visions in the SFMS are translated into on-the-ground practices.*

**Tenure and license renewals.** Of the productive forest land on the Island, 59% has been tenured to the province's two pulp and paper companies (p. 21). The Government of Newfoundland and Labrador is currently contemplating potential new forestry development in Labrador, and will in the future need to address the upcoming expiry of various timber licenses, including the Labrador Linerboard licenses (expiring in 2005), the non-renewable licenses issued originally to Anglo-Newfoundland Development Company and currently held by Abitibi-Consolidated (expiring in 2010) and eventually licenses held by Kruger that expire in 2037. Bill 27, passed in the House of Assembly last fall, states that "Commencing not less than 12 months before the expiry of the licenses to cut timber referred to in subsection (1) [the Abitibi non-renewable licenses], the minister shall initiate and conduct a public consultation process with participants in the forest industry as well as interested individuals, groups and affected communities to explore and consider the full range of forest uses in relation to the areas covered by the licenses." Although this requirement technically refers only to the licenses expiring in 2010 it clearly reflects the will of the citizens of Newfoundland and Labrador, and the minister would be seriously remiss in his/her responsibilities if he/she did not commit to fulfilling the spirit and intent of this requirement both in any new licenses issued in Labrador as well as in any renewal or reallocation of the Labrador Linerboard licenses. That commitment should be embedded in this new strategy. We look forward to contributing to those public consultations.

The current forest tenure arrangements also pose significant institutional constraints to the promotion of non-timber values in the province. In order for the public to become more effectively involved in the process, the strategy document should discuss the finer points of these arrangements in greater detail, explaining the differences among the various types of tenure, outlining the time frame of tenure renewal and the implications of these tenure arrangements for the promotion of non-timber forest values, especially protected areas.

The situation in Labrador is again different since there are no tenure strategies and land and resource use has not as yet been planned. Land Claims coupled with current inaccessible resource determines that Labrador's situation is quite different and provides a unique opportunity to innovate with new solutions to forest management problems.

*Recommendation 13: Consultation processes (such as those established for the Abitibi Consolidated 99-year leases) should be embedded in the strategy for all leases and better explanation of the different tenure structures should be made available so that the public can effectively participate in these consultations. We recommend that the DFRA explore more public ownership and control over forest resources on the Island and to maintain public ownership and control over forest resources in Labrador.*

**Climate change.** The strategy is lacking any significant measures to address climate change, aside from a goal to maintain and enhance carbon sinks. It is important for a long-term forest strategy to adequately respond to the challenges faced by climate change. The strategic response should be three-fold:

- a) Communication of climate change *impacts* on forests, and the importance of significant action to reduce those impacts;
- b) A strategy to *adapt* to climate change impacts, including adequate recognition of the need for large protected areas to allow for species migrations; and
- c) Appropriate *mitigation* measures, including a commitment to conserve existing carbon reservoirs, especially in old-growth forests.

*Recommendation 14: The SMFS should adequately deal with the issue of Climate Change by developing strategies to incorporate the aforementioned issues.*

### **3 Page-by-page specific comments and suggestions**

- 1-2 We recommend that SFMS not make the assertion that various terms describing forest management be considered as equivalent to each other and used interchangeably. *Ecosystem-based management* and *ecosystem management* mean that social and economic concerns are fitted into what works within the ecosystem; these terms should only be used in situations where ecosystem concerns are paramount. *Sustainable forest management* is different, since it involves an equal consideration of all three components of sustainability. And *sustainable forestry* could easily be confused with sustained yield forestry, which is concerned primarily with the sustainable production of commercial fiber. These terms mean different things, and in the interests of increasing awareness and understanding of sustainable forest management (Goal 1 under Value 6.4, p.76), we recommend that NFS should clearly interpret these terms and use them correctly in their appropriate context, rather than confusing the issue by asserting that ecosystem-based management is the same thing as sustainable forestry.
- 2 There should be an explanation of how the Precautionary Approach will be used to moderate the Adaptive Management approach; otherwise the adaptive management approach risks becoming nothing more than “talk and log.”
- 10 Focus is placed on the development of a regulated forest. This is contrary to many biodiversity objectives and has as its goal the regulation of forest growth and yield.
- 10-11 We would appreciate more information about why NFS sees the need to “streamline” the planning process, and how it will accomplish this in a way that protects the environment as well as the public interest.
- 11 The list of influential documents should include the *National Forest Strategy 2003-2008*.
- 15 We are pleased to see a commitment to apply a more ecological approach to forest management.
- 16 The commitments to build the value-added and non-timber forest product industries are important.

- 16 We appreciate the recognition of third-party audits. However, the movement towards achieving ISO 14001 certification, while a good start, does not go far enough. The Forest Products Association of Canada requires all its members to be certified to one of three certification systems (FSC, SFI or CSA) by 2005. The Province of New Brunswick has similar requirements. The NFS should require license-holders to go beyond ISO certification (at the very least mirroring FPAC requirements), and commit to achieving FSC certification on crown lands. This would put Newfoundland and Labrador's forest management regime in a leadership position.
- 25 The figures on person-years of employment would be more informative if they were reported with historical records showing trends over 20-40 years. This information is especially important for a long-term strategy.
- 34 We are concerned about the re-classification of municipal water supply areas as available for harvest (p.34). This is a significant change that affects people in communities across the province and there should be further discussions and consultations with affected communities.
- 35 The commitments to withdraw lands for pine marten habitat, wildlife corridors and protected areas are laudable, but more detail is needed. What specific changes have been introduced? Which areas of productive forest have been withdrawn? What status do these withdrawals have? Furthermore, what measures are in place to deal with public demands for additional withdrawals? None of the areas proposed in the Natural Areas Plan have undergone any public or independent scientific scrutiny since the Natural Areas Plan Committee first proposed them in 1996-97. It is possible that given new scientific knowledge, and changing social values, that some of the areas currently identified in the Natural Areas Plan will be enlarged in the process of public hearings. We feel it is crucial that NFS establish a mechanism to deal with potential trade-offs between enlarged protected areas and reductions in AACs. If this information is too much detail to be included in the strategy, where is it summarized and publicly available?
- 37 There is reference to the special yield curves needed for the stands in the Main River watershed. As the evidence mounts that similar or analogous growth conditions apply elsewhere in the province, especially on the east side of the Great Northern Peninsula, we hope that these yield curves will be applied wherever they more accurately describe actual growth conditions. The need for growth curves and stand disturbance models that more closely approximate actual conditions is especially acute in Labrador, where research suggests that fire return intervals are over 200 years and may be as high as 600 years. In addition, there are distinct differences in stand types and their derivations between coastal Labrador and valleys further inland due to steep climatic gradients which must be accommodated in the models.
- 46 The promised work on the development of disturbance regimes is encouraging. It is essential that a forest disturbance regime for the province be developed because old forests, including old growth forests, are best understood within the context of forest disturbance.

- 46 The commitment to research the percentage of a watershed that can be harvested without impairing water quality and quantify is heartily welcomed and long overdue. We urge NFS to move rapidly to establish appropriate limits in its revised environmental protection guidelines.
- 48 The commitment to consult with national and provincial parks officials on all activities within a kilometer of parks in an excellent commitment. We believe however that 10 kilometers would be a better threshold to trigger these consultations, as activities such as road building have the potential to have significant impact beyond 1 kilometer from protected areas. It is important that the recommendations of these officials be made public, so that concerned citizens can readily see the extent to which their advice has been heeded. In addition to national and provincial parks, proposed and established ecological and wilderness reserves should be added to the list.
- 48 The commitment to consult with the Inland Fish and Wildlife Division to ensure adequate habitat for wildlife of concern is welcomed. We urge that a similar commitment be made to consult with the Canadian Wildlife Service on relevant migratory bird populations and habitat needs.
- 51 Further information should be provided on Goal 2 “Represent adequately the various forest successional stages in the province”. Will these protected forests be represented within reserves proposed in the Natural Areas Plan?
- 53 An additional important recommended indicator for wildlife habitat should be population levels of priority migratory birds. The North American Bird Conservation Initiative, of which the Newfoundland government is a participant, is preparing lists of priority bird species and population objectives for each region of the country. This data should be used as the basis for identifying habitat management needs accordingly.
- 55 It is stated that a timber production approach protected forests from insects, diseases and fire (p.1). How does this relate to the stated goal of maintaining “the natural processes of forest ecosystems within the province?” The section on Natural Processes and Ecosystem Health lacks any actions aimed at recognizing the critical role of fires and insects in driving natural forest succession. Actions to be included, for instance, could include:
- Development and implementation of fire management policies that recognize the ecological value of fires and identify circumstances in which fires will be allowed to burn
  - Development and implementation of insect management policies that recognize the ecological value of insects, that prohibit the use of chemical insecticides and that result in a steady and measurable reduction in the use of all biocides.
  - Development and implementation of harvesting guidelines that emulate the residual structure left behind following natural disturbances.
- 62 The goal to maintain and enhance carbon sinks in the province should be revised to reflect the language in the National Forest Strategy, which specifies that carbon

*reservoirs* will be maintained. This important change better recognizes the role of mature forests, forest soils and peat lands in storing significant quantities of carbon.

- 62-63 The goal of no net permanent forest loss is an important goal. Indicators to accompany it should include figures on deforestation due to factors outside the direct control of the forest industry (withdrawals for other uses including mines, hydro reservoirs and power corridors, recreational and agricultural developments, etc), factors within the control of forest managers (roads, landings, NSR lands), as well as rehabilitative measures taken by forest managers (road decommissioning, land reclamation, etc).
- 66 No mention is made in the plan or Draft Appendix 1 of monitoring the cumulative ecological impacts of resource roads. Appendix 1 states “Some roads which are deemed no longer necessary are deactivated in such a fashion that the area previously occupied is returned to a productive state”. But when exactly is a road deemed no longer necessary? This document does not demonstrate a commitment from the NFS to minimize the negative effects of new road establishment such as habitat fragmentation, increased poaching, ATV use, and illegal cabin development. We request that further information be provided on the NFS’s policy on resource road construction and maintenance with particular attention paid to minimizing cumulative ecological impacts
- 68 We are concerned at the proposal to expand logging in riparian buffers and previously inaccessible areas (p.68). Strategies targeted to pursue this goal include: 1.) allocating municipal supply areas to the operable land base, 2.) partitioning of the AAC that allows for the harvesting of small isolated stands, 3.) selective harvesting within established riparian buffer zones, 4.) maximization of the use of hardwoods for domestic and commercial purposes. These measures, among others, increase the pressure on the forest resource to the point where non-timber values are given even less credence than before. This illustrates a conflict of values within the strategy with relation to the development of protected areas. There must be adequate consultations before such changes are introduced.
- 71 We support the recognition that there is a role for the sustainable domestic harvest of wood. The proposed action to mitigate the impact of domestic timber harvesting on the forest industry does not belong in this section. The NFS should not support the goal and then in the next breath seek to undermine it.
- 75 The plan to develop value maps for each district is a valuable one, and we are prepared to assist those efforts through our own mapping efforts and with the collaboration of organizations such as Global Forest Watch, which has valuable national-scale information on values such as intact forests that should be reviewed and validated at a local level.
- 75 Proposed additional indicator for Value 6.2 “Forest contribution to community stability”:  
Number of households in a community that use non-timber forest values: e.g. hiking, walking, camping, berry-picking, snowmobiling, etc.

76-77 We support the commitment to informed decision-making. We would suggest an additional goal; to support and increase public access to information in a timely fashion. Specific actions in support of this goal could be to ensure public access to key information before decisions are made, including wood supply assumptions, timber inventory, insect surveys, etc.