

Dagdick, Elise (CON)

From: Stephens, Jonathan (CON)
Sent: Monday, January 04, 2010 2:54 PM
To: Dagdick, Elise (CON)
Cc: Barto, William (CON); Braun, Tracey (CON)
Subject: EA Proposal - Tembec Enterprises Inc. 2010-2029 Forest Stewardship Plan - File No. 4572.00 - due December 28, 2009

The Sustainable Resource and Policy Management (SRPM) Branch has reviewed the EA Proposal for the Tembec Enterprises Inc. 2010-2029 Forest Stewardship Plan and offers the following comments:

The SRPM provides the following recommendations for Chapters 1-9 and Appendices of the EA Proposal, the Environmental Impact Statement (EIS) Component:

1. **Concern:** Areas of Special Interest (ASIs) are not mentioned in the Environmental Impact Statement (EIS), except as a dataset used in planning. The Director of Forestry notified Tembec in 2006 that O'Hanley and O'Hanley River ASIs capture target enduring features not yet protected, and would remain on the map as areas to be considered for future protection by the Protected Areas Initiative (PAI).

According to Tembec's Forest Stewardship Council (FSC) Certification Smartwood Audits in May and September 2007, Tembec is required to establish ASIs identified as gaps in the protected areas network, and operate only outside these areas. Although ASIs are study areas that are not legally protected, the ASIs located in FML-1 should remain free from logging activity as part of Tembec's FSC certification.

Recommendation: that the EIS include and address the four ASIs currently located in FML-1: O'Hanley, O'Hanley River, Anson Lake, and Springer Lake

2. Executive Summary *Table 9 Impact Implications on Multiple Benefits to Society (Non-timber Values 2 of 2)* assigns "M" impact ratings – Significant/Mitigable Impact on Protected Areas – to two Forest Management Activities: "Road & Watercourse Crossing Planning" and "Harvest & Renewal Planning".

Concern: A number of the proposed Harvest Operating Areas occur near or adjacent to existing protected areas. Although Forest Management Activities are not allowed inside protected areas, activities occurring on the landscape adjacent to protected areas may adversely affect the protected areas indirectly (i.e., erosion; excess siltation in watercourses flowing into/ through protected areas; drift from chemical stand tending activities). Activities that adversely affect protected areas are prohibited by law, and should be mitigated to the satisfaction of Manitoba Conservation.

Recommendation: that "M" ratings also be assigned to the following Forest Management Activities occurring near protected areas to satisfy the concerns noted above:

- All Infrastructure Development Activities
- (or at least: All-weather Road (Class I & II); Dry-weather Road (Class III); Winter Road (Class IV); Road & ROW Maintenance; Permanent Watercourse Crossings; Temporary Watercourse Crossings; Camps, Timber & Fuel Storage Sites; Non-hazardous Construction Waste;

- Decommissioning)
- Logging (Felling/Forwarding)
- Slashing & Woody Debris Management
- Site Preparation/Scarification
- Chemical Stand Tending
- Insect Disease & Control

3. **Concern:** Areas of Special Interest are not included as a non-timber value in Table 9, and should be for reasons stated in point 1 above.

Recommendation: that a column be added to this table for Areas of Special Interest, and that “I” impact rating – Insignificant/ Mitigable Impact – to two Forest Management Activities: “Road & Watercourse Crossing Planning” and “Harvest & Renewal Planning”

4. **Recommendation:** Section 7.2.3 Forest Management Activities Assessment, p.3 Planning – Public Participation – first bullet should also include ASIs as areas considered as “closed to logging” as Tembec’s FSC does not permit logging in ASIs
5. **Recommendation:** Section 7.5.2 Data Adequacy and Gaps –add Areas of Special Interest to this list.
6. In Section 7.5.3.17 Protected Areas – the text is not accurate.

Recommendation: Remove the text starting on p. 68 “*The Natural Lands and Special Places Strategy. . .*” and ending “*...areas that can be identified and mapped at scales of 1:500 000 – 1:1 000 000.*”, and replace with following two paragraphs, quoted from Protecting Manitoba’s Outstanding Landscapes: Manitoba’s Protected Areas Initiative, Manitoba Conservation. 2008. (http://www.gov.mb.ca/conservation/pai/pdf/protected_areas_booklet_web.pdf)

“Manitoba's Protected Areas Initiative (PAI) is a government program dedicated to building a network of protected areas designed to conserve ecosystems and ensure their future viability. The goal of the Protected Areas Initiative is to permanently protect a representative sample of each of the province’s 18 natural regions and sub-regions therefore conserving the biodiversity of the Province of Manitoba.)

“To establish protected areas, the Protected Areas Initiative follows a specific scientific process, based on sound ecological principles and criteria. The Protected Areas Initiative has adopted an “enduring features” approach to assess the adequacy of existing protected areas and to identify lands that would best complete natural region representation. Each natural region is divided into units called enduring features based on surficial geology, soil type, and terrain features. These features are relatively stable over time and support unique groupings of plants and animals.

“Representation” is a term reflecting the proportion of each enduring feature that is protected, and the confidence that ecological integrity is likely to be maintained over time. Representation is said to be Adequate, Moderate, Partial or Not Captured based on the rating system proposed by the World Wildlife Fund Canada’s Endangered Spaces Campaign in 1995.”

7. In Section 7.5.3.17, p.69, the EIS states:
 “The planning of road development and harvesting and renewal operations to limit operations to areas outside of the established and recognized boundaries of protected areas provides mitigation of potential impacts in terms of these areas.”

Concern: Limiting harvest and renewal operations to outside protected areas does mitigate direct impacts of operations on these designated areas. However, activities occurring adjacent to protected areas may adversely affect them as well (i.e., erosion; excess siltation in watercourses flowing into/ through protected areas; drift from chemical stand tending activities). Activities planned adjacent to protected areas should be carried out in a way that maintains the natural values for which these areas were protected, and measures should be taken to mitigate any potential effects to them.

Recommendation: the text be changed to reflect the requested changes to Table 9 from the Executive Summary above (point 2):

“The planning of road development and harvesting and renewal operations to limit operations to areas outside of the established and recognized boundaries of protected areas mitigates most ~~provides mitigation of~~ potential impacts ~~in terms of these~~ to protected areas. Activities planned adjacent to protected areas will be conducted to mitigate any potential adverse impacts on the protected areas.”

The following are recommendations for Chapters 10-15 of the EA Proposal, the Environmental Management System (EMS) Component.

8. Section 15 *Table 46 Tembec Forest Management Information System Data List Summary* (part of the 2008 Local Levels Indicators Report)

Recommendation: On page 75, the following datasets are listed incorrectly – please amend as described:

Data Layer	Source
Natural Regions	Protected Areas Initiative
Protected Areas	Protected Areas Initiative
Federal Parks	this information should be sourced from the federal government

Parks Areas of Special Interest (should be listed As Areas of Special Interest)	Protected Areas Initiative
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Natural Park Representation Please clarify which layer is being referenced with PAI staff

9. Section 14 – DOP Procedures: WDS-002 3.1 Outside Inputs
Recommendation: Protected Areas, ASI and designated Crown lands datasets from Manitoba Conservation should be included as part of the pre-harvest assessment planning
10. Section 14 – DOP Procedures: WDS-009 2.1 Provincial Inputs
Recommendation: Protected Areas, ASI and designated Crown lands datasets from Manitoba Conservation should be included for the Road Development and Access Management Plan