December 21, 2007

Review of
High Conservation Value Forest Assessment StoraEnso Port Hawkesbury Forest Management Area

Ronnie Drever, Ph.D., The Nature Conservancy
cdrever@tnc.org

Introduction

Upon request by Andrea Doucette (Supervisor, Forest Sustainability), I reviewed the High Conservation Value Forest Assessment for StoraEnso's Port Hawkesbury (SEPH) Forest Management Area (December 2007 draft). I evaluated both the strengths and areas for improvement of the HCVF report, and provided a set of general and specific recommendations aimed at addressing the areas for improvement.

Report Summary

Based on a wide array of data sources and technical expertise, and as part of Forest Stewardship Council certification, the StoraEnso Port Hawksbury HCVF report identifies a set of ecological values designated as HCVF as well as outlines their management strategies. For each HCVF, a rationale for the designation decision is provided. The report is in an advanced draft form, dealing only with Category 1-3 HCVs and does not deal with monitoring – a requirement for meeting FSC's Principle 9.

Strengths

a. *The report is readable and thorough*: it relies on best-available and authoritative data sources, presents mapped spatial data where possible, shows a high amount of precaution in its HCVF management strategies, enjoys wide stakeholder buy-in and has clear ties to ongoing land use planning initiatives. Moreover, many components rely on advanced analyses (e.g. large landscape forests, representation analysis, Human Footprint analysis, TNC's NAAE analysis) and several of the presented management strategies are innovative and based on sound conservation biology (e.g. squirrel management techniques for "lifeboating" Canada lynx in the working forest through lean snowshoe hare periods). **This report is easily among the best I've reviewed.**

b. *The report takes a broader perspective on HCVF identification and management than simply restricting the analyses to the tenure area* – elementary conservation biology.

c. *Many of the management strategies outlined are consistent with the precautionary principle.* In many cases, StoraEnso assumed the burden of proof and has prescribed no-harvest for mapped values in the absence of evidence that harvesting will not compromise the HCV. This approach extends to several values for which there are ongoing research or consultation efforts.

d. *The consultation process behind the HCVF identification seems comprehensive and sound*, with a wide variety of stakeholder input. Moreover, since StoraEnso and CPAWS-NS are part of a

broader coalition involved in protected areas and land use planning for Nova Scotia (Colin Stewart Forest Forum), there is a clear link to a provincial planning process – this link seems to have been helpful in terms of access to provincial data sets and should help ensure legislated approval for protection or effective management of identified values.

e. *The report clearly lays out the management approach used for each HCV* directly adjacent to the description and designation rationale. This effective report structure is not often used in HCVF assessment.

Areas for improvement

a. *There are several places in the HCVF report where management recommendations are vague or make reference to policy initiatives that are under development* e.g. mainland moose. I recognize that in some cases this will be remedied as the policy initiatives unfold. In other cases, however, the language is just vague or comprised of motherhood statements e.g. "SEPH will strive to minimize negative impacts from roads …"; "SEPH will reduce the impacts of roads in Canada lynx areas …"

Recommendation: Management statements should be made as clear and operational as possible by stating applicable targets, thresholds or deadlines.

b. *No monitoring strategies are presented.* I recognize the absence of monitoring strategies is a consequence of the draft stage of the report. The monitoring strategies to determine whether the management strategy will maintain or enhance each designated HCVF should be placed adjacent to the management strategy.

Recommendation: As the work advances, ensure monitoring strategies are clearly linked within the report to the designated HCVF and proposed management.

c. *The report would benefit from an editor's hand.* Several sections are repetitive or need re-writing; I've mentioned some of them in the specific comments section. I recognize this is likely a consequence of the draft stage of the report.

Recommendation: Have an editor unfamiliar with the report read it for redundancy and clarity. An HCVF report can be a valuable communications tool to allow stakeholders, FSC auditors and the interested public understand what StoraEnso is doing to address HCV issues. This is a very good report that should be showcased as an example of an effective HCVF process.

Specific comments

p. 1, A **summary or abstract of the report is needed**, ideally including a table that details the identified HCVs, their management strategies and applicable monitoring framework.
p. 6, It is unclear what exactly constitutes an EPU; provide definition.
p. 6, It is unclear at this point if the values being listed are HCVs in the technical sense of FSC certification, or if they simply represent ecological values that StoraEnso already considers important. Clarify.
p. 8, 3.2, Description of GIS tools is probably not necessary. Also, it seems to me the five questions presented actually represent a set of criteria used to determine whether to designate a given value as an HCV. Because the designation decision invariably involves a judgement call, it is important, probably in the Introduction, to **clearly lay out the decision framework** or criteria used in making the designation decision. At the moment, although the five questions represent some of the information used to make the HCV designation decision, they not presented as a designation framework, for example, by arranging these questions in flow diagram (if the questions were answered in a hierarchical

manner) or by discussing how a positive or negative answer to each question influenced the designation decision. Presenting such a framework would make this report consistent with other recent HCVF reports.
p. 10, 3.3, last paragraph. No brief discussion on Category 4-6 HCV is presented in this draft of the report.
p. 20, Marten management: unclear how SEPH will manage trapping. I realize that trapping is probably not the responsibility of SEPH, but the company ostensibly has some responsibility in access management to the Marten HCVF area. This responsibility needs to be addressed.
p. 22, Road density management is vague, listing no targets, thresholds or deadlines for when more specifics may be expected.
p. 44, Figure 4-16. Include the SEPH tenure area and the name of the protected area in the NW of figure.
p. 49, Management approach: although a 100-m buffer seems large enough to mitigate the microclimatic effects associated with edge creation, what data are this prescription based on?
p. 50, Management approach: it is unclear if and how personnel from SEPH would be able to recognize Frost-glass whiskers, much less implement the management approach described here. Perhaps tree markers should be made aware of the potential stands this species can occur.
p. 52, Q2. Are there any species that only breed in Nova Scotia, e.g. migratory birds or other species, that could be considered endemic?
p. 55, Management approach: the target of maintaining < 20% of the special management watersheds in an open forest condition is consistent with literature showing that if disturbances in boreal watersheds are kept to < 25% of the basin area, there is little effect on annual water yield or peak flows (although an increase is apparent for summer low flows and in-stream temperatures)[1,2].
p. 61, Figure 4-24. This figure is mostly meaningless to anyone not knowledgeable of Cape Breton geography.
p. 63, Management approach, mature red spruce stands: I like the modified shelterwood approach proposed here. However, to maintain structural heterogeneity and to speed the transition to a multi-sized (aged) cohort structure, the **overstory harvest should retain representative large, mature red spruce** stems. I think this is what is proposed here, although it is not clear.
p. 66, Coastal Plain Flora. "principle" should be "principal".
p. 68-72, Q6. **I congratulate StoraEnso for the approach taken here regarding protected areas** and for recognizing these areas are not isolated islands. Despite the obvious significance of PAs as areas of high conservation value, most HCVF reports do not make this designation on the grounds that since PAs are outside of the managed landbase they do not merit HCVF status or because the National Boreal Standard states these areas are not HCVs. This approach is inconsistent with basic principles of conservation biology that recognize that many ecological processes transcend PA boundaries and that managers have a responsibility for ensuring management activities outside the PA do not deleteriously influence the integrity of ecological processes and structure inside.
p. 72, Q6. This section should recognize the areas potentially worthy of HCVF designation mapped by the '2 Countries 1 Forest' initiative, as stipulated by the part of Q6 that states "Does the forest lie within, adjacent to, or contain a conservation area … (c) identified in regional land use plans or conservation plans?" I note these areas are later recognized as HCVFs under Category 3 HCV.
p. 73, Methods. The 2nd paragraph in this section is probably not necessary; the CSFF is described on p. 10.

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[1] Buttle JM & Metcalfe RA. 2000. Boreal forest disturbance and streamflow response, northeastern Ontario. CANADIAN JOURNAL OF FISHERIES AND AQUATIC SCIENCES 57: 5-18.
[2] Bourque CPA & Pomeroy JH. 2001. Effects of forest harvesting on summer stream temperatures in New Brunswick, Canada: an inter-catchment, multiple-year comparison. HYDROLOGY AND EARTH SYSTEM SCIENCES 5 (4): 599-613.

p. 74, 2nd paragraph. If any of the analyses undertaken by the NAAE are published, they should be cited here.
p. 74, Results. Delete "chronologically".
p. 76, Figure 4-33. Several of the patches identified here are actually part of larger forest fragments identified by Global Forest Watch Canada[3] as having no agriculture, recent harvesting, mining, roads, pipelines, powerlines and other permanent infrastructure (see Figure 1 below). While I suspect there are methodological reasons behind these discrepancies, it is unclear to me what exactly these reasons are and why they would result in smaller patches being identified here. That said, I again commend StoraEnso for designating these areas as HCVs and for the management approach outlined for their maintenance or enhancement (with the caveat that the effectiveness of the management approach will intimately depend on the outcomes of the road strategy).
p. 78, Management approach, Editing for redundancy is needed here.
p. 85, Methods, 1st paragraph, Editing for redundancy is needed here.
p. 89, Table 4-7, Formatting needed.
p. 90, Methods, Formatting needed.
p. 103, 2nd bullet point, description of the types of methods envisioned for steep slope silviculture would be beneficial.
p. 105, Q19, I look forward to seeing how StoraEnso and CPAWS-NS handle this question.

Conclusion

It is abundantly clear that StoraEnso, in partnership with CPAWS-NS, has taken a serious and committed approach to the identification and sound management of HCVF in the SEPH area. Congratulations. Recognizing the work is ongoing, I expect the same high quality of data inputs and analyses to be applied to the identification, management and monitoring for Category 4-6 HCVs.

[3] Lee P, Gysbers JD & Stanojevic Z. 2006. Canada's Forest Landscape Fragments: A First Approximation (A Global Forest Watch Canada Report). Edmonton, Alberta: Global Forest Watch Canada. 97 pp.

Figure 1. Large landscape fragments (yellow polygons) in the StoraEnso Port Hawksbury Forest Management Areas as indentified by Global Forest Watch Canada (Lee et al. 2006).

March 23, 2009

Review of
High Conservation Value Forest Assessment
of NewPage Port Hawkesbury Forest Management Area:
Part 2 (HCVF Categories 4,5 and 6)

Ronnie Drever, Ph.D., The Nature Conservancy
cdrever@tnc.org

Introduction

Upon request by Andrea Doucette (Supervisor, Forest Sustainability), I reviewed the second part of the High Conservation Value Forest Assessment for NewPage's Port Hawkesbury (NPPH) Forest Management Area (March 13, 2009 draft). I evaluated both the strengths and areas for improvement of the HCVF report, and provided recommendations, where relevant, to address areas for improvement.

Report Summary

As part of Forest Stewardship Council certification, the NPPH HCVF report for HCV Categories 4-6 considers a wide array of information and data to assess the presence of forest areas that hold significant conservation value in terms of services of nature, local community needs, and traditional cultural identity for Aboriginal people of eastern Nova Scotia. No HCVFs are identified.

Strengths

a. *The report outlines several strategies and procedures presently in place to identify and conserve areas with potential high conservation values* sensu *HCV Categories 4-6.*

Areas for improvement

a. *Further justification is needed for Questions 13 and 14 of how standard operating procedures at NPPH will maintain or enhance areas that potentially are HCVF. See comments below.*
b. *Question 17 needs more work; in particular, a more thoughtful approach is needed about how to deal with the data presented in Fig. 4-49. As is, the report writers have argued, rather simply, that a system is in place to monitor and map requests for forest access by a variety of users and that based on the presence of this system, no HCVF designation is warranted. However, no analysis or rationale is presented to demonstrate if areas of particular high density of requests exist, and what particular procedures or protocols are in place to ensure forest management is consistent with the continued use of these forest areas by the public and First Nations.*
c. *Given the data richness and depth of analyses in Part 1 of this report, and the presence of abundant data on forest use by the public (Fig. 4-49), the handling of Question 19 is quite poor.*

Specific comments

Question 13, Rationale, 2nd paragraph. Add 'increased siltation, and nutrient and pollutant loading' to the list of possible impacts from removal of forest cover.

Question 13, Results, 3rd paragraph. This section needs considerably more detail regarding watershed-level management:

- What proportion of all watersheds in the NPPH area is represented by the 17 watersheds selected?
- More specifically, how many and what types of watershed are being missed by not measuring *all* watersheds under full or partial management?
- What 'order' are these watersheds (i.e. first, second, or third)?
- What is the biophysical basis for the 80 % threshold of closed forest condition? Although evidence does indeed suggest that if disturbances are < 25% of the basin area at any given time, there is little effect on annual water yield or peak flows, the same evidence suggests an increase in summer low flows and in-stream temperatures even when disturbances are less than 25% of basin area[1,2]. Note also the scale relevance i.e. small watersheds behave differently than large watersheds in terms of their hydrological response to harvesting[1].
- Is it really accurate to assume a 12-yr or 2-m tall stand will exhibit the same hydrological behaviour as a mature or fully closed stand? What is the rationale?
- Are there other types of harvesting besides clearcutting allowed beyond the 80% threshold?
- In the municipal watersheds, what is the amount of impervious surface? How is the amount of impervious surface being considered in harvesting decisions?

Question 14, Rationale, 2nd paragraph. Canopy composition is also important in determining the shape and type of annual hydrological response.

Question 14, Results. More details on the guidelines and special management recommendations for selected wetlands would be beneficial. Moreover, some indication is needed of the *effectiveness* of these strategies for conserving hydrological function.

Question 14, HCVF Decision. Add 'area' after 'operating'.

Question 17, Results. I would have appreciated seeing some examples of potentially conflicting values (i.e. IRM Category 3) and how these conflicts are dealt with by NewPage. The fact that these conflict areas exist suggests that multiple overlapping forest values are indeed the case (see comment for Question 19).

Question 17, Table 4-14. Several categories are unclear e.g. 'exploration', 'multiple use'.

Question 17, 'NPPH Initiatives Related to Public Forest Use'. What is 'fir tipping' (fur trapping?)? More details are needed on the strategy of access management for HCVF alluded to here.

[1] Buttle JM & Metcalfe RA. 2000. Boreal forest disturbance and streamflow response, northeastern Ontario. CANADIAN JOURNAL OF FISHERIES AND AQUATIC SCIENCES 57: 5-18.

[2] Bourque CPA & Pomeroy JH. 2001. Effects of forest harvesting on summer stream temperatures in New Brunswick, Canada: an inter-catchment, multiple-year comparison. HYDROLOGY AND EARTH SYSTEM SCIENCES 5 (4): 599-613.

Question 17, HCVF Decision. I was unable to follow the logic behind the designation decision. NPPH has data on 1,640 requests for forest access by the public since 1964. While these data are mapped (Fig. 4-49), they appear untapped for the wealth of information they potentially hold for understanding the distribution and abundance of non-timber values important for local or Aboriginal communities, *and locating the forest areas particularly important for the public and First Nations.* In other words, while the report writers have described many local uses for non-timber values, they failed to show an earnest attempt to gauge the presence of HCVF based on available data.

Question 18. The cultural and First Nations information presented here is very valuable. Also, I commend NPPH for their support and funding of Unama'ki Institute of Natural Resources and other FN-values mapping initiatives on Cape Breton Is.

Question 19. Given the wealth of spatial data available to the report writers, both in this part of the report and the part dealing with HCV Categories 1-3, I don't understand why a more rigorous and serious analysis of overlap was not done. The designation rationale is unsatisfactory. At the moment, the conclusion of 'no apparent significant overlap of values' seems speculative and unsubstantiated.

Conclusion

Part 2 of the NPPH HCVF report does a reasonable job at giving the reader an idea of how social and economic non-timber values are handled in the tenure area. While it's clear that NPPH takes these concerns seriously, the report does little to locate areas where these non-timber values are particularly important or concentrated, and how they are related to the areas identified by Part 1 of this report.

HCVF REPORT
STORA ENSO PORT HAWKESBURY FOREST MANAGEMENT AREA
COMMENTS BY RIKE BURKHARDT
DECEMBER 2007

Note: I have *italicized* sections quoted from the report – my comments are in **bold**

General Observations

- **I appreciate the format of the report – it is, compared to others, relatively easy to read and assimilate the large amounts of information – nice use of maps, etc.**
- **The report generally covers all the bases but I am left feeling it is sometimes short on detail (esp. re: management approaches) as noted in the various sections**
- **Don't see much discussion on monitoring and adapting management strategies as necessary**
- **I often found the "Management Approach" sections vague – they do not reference specific requirements, guidelines, policies or how/where/when/by whom the approach will be implement eg. through management plans? operational plans? separate monitoring strategies or under existing forest monitoring requirements?**
- **I think readers would like to know where the management approach identified through the HCVF report differs from the minimum approach required under provincial law**
- **A "road mitigation strategy" is often referenced – it would be useful to include a descriptive paragraph somewhere putting this into context, being that roads are invariably one of the biggest management challenges – eg. why it is necessary, what are the major access issues on the forest and their impacts, when/by whom this road mitigation strategy will be developed and implemented (or at least reference a section if it is in fact part of the full certification report) and the government's role in the strategy and its implementation**

p. 6

- ***During the HCVF assessment process, several of these ecological and societal values have been identified as high conservation values. Values that SEPH currently manages for include:* - that are managed currently under provincial law or as per identified HCV? Not entirely clear.**

p. 11

- **I'm not overly familiar with the situation in Nova Scotia vis a vis the First Nations communities there but it seems to me there should be some involvement of affected communities (if any) in the CSFF or general decision-making/discussion/negotiation of protected areas**
- **Shouldn't traditional values be a subset of the data used in identifying priority areas for protection? Or at least overlaid as a layer for information purposes?**
- **When would the First Nations be included in this process? If they are already, it is not clear.**

Question 1:
Does the forest contain species at risk or potential habitat of species at risk as listed by international, national or territorial/provincial authorities?

American Marten HCVF Decision:

- **"*All lands managed by SEPH within the MHMZ are considered to be an HCVF*" – what area/proportion of lands is this relative to the total 300 km^2 area of occurrence (eg. this number would be useful to understand the significance of SEPH lands and what contribution they make to the total remaining marten habitat)**

- **Marten Management Approach**
- ***Recommendations from the American marten recovery strategy will be implemented and SEPH will work to maintain and restore American marten habitat in Nova Scotia* – does that mean ALL recommendations from the recovery strategy or just some – the wording is ambiguous**
- **I would clarify and make a link to the recovery strategy if possible**

Mainland Moose Management Approach

- **some more (brief) detail on CMZ's would be helpful so as not to have to delve into the management plan for explanation – also reference the source eg. forest management plan? other?**

- *In consultation with NSDNR and the HCVF Steering Committee, SEPH will strive to minimize negative impacts from roads by minimizing road density and restricting public motorized access into important moose areas*. **– this is fairly vague and non-committal, should reference a more specific strategy or link directly to road impact mitigation study**

<u>Bicknell's Thrush HCVF Decision</u>
- *All existing Bicknell's thrush IBA sites (with the exception of Kelly's Mountain) are considered HCVFs (Figure 4-7). Within SEPH's area of operation, these currently include Cape North and Scaterie Island.*

- *Additional sites within the Cape Breton Highlands, particularly sites found south of the National Park, are also known to contain Bicknell's thrush, in part, through research efforts carried out by Bird Studies Canada and the Canadian Wildlife Service (Figure 4-8)."* – **and? will these also be HCVF?**

Rusty Blackbird Management Approach
- *SEPH will continue to manage riparian areas with 20 m buffers to comply with the provincial regulations for riparian management and 100 m buffers for Canada lynx habitat where some overlap may exist with rusty blackbird habitat*." – **this does not seem to address the other issue identified eg. the loss of interior forest habitat through clearcutting** (*eg. Clearcutting can be particularly damaging to rusty blackbird habitat by opening-up interior forests*")

Boreal Felt Lichen
- *Potential boreal felt lichen habitat in Nova Scotia has been modelled and mapped by NSDEL using a GIS predictive analysis that combines a number of habitat factors, including physiography, topography, forest cover, hydrology, and slope orientation.*
- **Has this model been ground-truthed at all?**
- **Doesn't move conservation goals forward if the model isn't know to be useful or accurate.**
- **Verifying model should be part of management approach.**

Question 2.
Does the forest contain a globally, nationally or regionally significant concentration of endemic species?

- **No comments**

Question 3. Does the forest include critical habitat containing globally, nationally or regionally significant seasonal concentration of species (one or several species, e.g. concentrations of wildlife in breeding sites, wintering sites, migration sites, migration routes or corridors – latitudinal as well as altitudinal, watershed level forests or riparian forests associated with high value fisheries habitat?

- **Are there important deer wintering areas on the forest?**
- **Aquatic ecosystems – how extensive/comprehensive is the fisheries data available for identifying critical areas that may require additional protection?**
- **What data is available for species other than salmon and trout? If no other issues, I would make this clear – it seems odd that all other species are completely absent.**
- **It appears that the management approach defaults to provincial standards in the "*Wildlife Habitat and Watercourse Protection Regulations*" – how does the generic use of buffers address situations where additional measures may be required or increased site sensitivity and does the current level of inventory allow the forest manager to identify such situations?**
- **It would be useful to reference (or footnote) sources where targets and standards are identified (eg. 20m buffers around >50cm watercourses) or state up front that provincial standards will be the default unless a different approach will be taken**

Question 4. Does the forest contain critical habitat for regionally significant species (e.g., species representative of habitat types naturally occurring in the management unit, focal species, species declining regionally, including concentrations of aquatic species whose habitat is dependent on riparian forest or watershed condition?

Gaspe Shrew
Management approach:
- *No harvesting will occur within known Gaspé shrew areas that have not been previously managed. These areas will receive full protection.* **– what kind of protection?**

Question 5. Does the forest support concentrations of species at the edge of their natural ranges or outlier populations?

- **No comments**

QUESTION 6
Does the forest lie within, adjacent to, or contain a conservation area: (a) designated by an international authority, (b) legally designated or proposed by relevant federal/provincial/territorial legislative body, or (c) identified in regional land use plans or conservation plans?

Protected Areas HCVF – Management Approach
- **Good use of buffer zone, so long as management actually reflects their different status**

- *No intensive forestry (e.g. plantations, exotics) will occur within these zones and road construction will be minimized to reduce access points into the protected areas."*
- *"Clearcutting in the Protected Area Management Zones will be avoided where possible."*
- **Words like "minimize" and "avoided where possible" are not that useful for understanding what the specific management approach will be and how success will be measured – will these be further defined somewhere else?**
- *Large landscape-level forests not recommended as protected areas through the CSFF process will remain as HCVFs and will be managed to maintain unfragmented wilderness values and high quality habitat* **– this should be more specific**

QUESTION 7
Does the forest constitute or form part of a globally, nationally or regionally significant forest landscape that includes populations of most native species and sufficient habitat such that there is a high likelihood of long-term species persistence?

Management approach:
- *Large landscape-level forests not recommended as protected areas through the CSFF process will remain as HCVFs and will be managed to maintain unfragmented wilderness values and high quality habitat* – **Great, but how?**
- **Should at least reference existing guidelines, if any, for managing "unfragmented wilderness values and high quality habitat" or give some indication of process/standards by which this will be done eg. are they subject to road mitigation strategy to be developed? Are there other special management provisions that will apply? The statement on its own does not provide much insight.**

Question 8.
Does the forest contain naturally rare ecosystem types?

- **Given the different criteria for protection through harvest deferrals, it would be interesting to know what proportion of lands are actually deferred and/or receiving modified treatment in the form of reduced management intensity, road mitigation, restricted access...this would be a useful statistic to include**

Question 9
Are there ecosystem types or ecosystem type conditions with the forest or ecoregion that have significantly declined, or under sufficient present and/or future development pressures that they will likely become rare in the future (e.g. old seral stages)?

- *A limited amount of field verification has been undertaken using the SOUF patches, so there is a certain amount of ambiguity within the dataset that will need to be worked out over time* **– how? It seems to me that if areas are being deferred indefinitely from harvesting based on their modeled characteristics it would behoove everyone to work this out as soon as possible to avoid losing area that is higher priority (that may be identified through field verification) or avoid unnecessarily tying up area that is not, in fact, in the SOUF category.**
- **Suggest making the link (if any) between the species at risk and their dependence (if any) on old growth forests (eg. frosted-glass whiskers)**

- *No primordial old growth forest will be harvested. These sites will receive full protection and will not be fragmented by road-building or other types of activities associated with the use of*

adjacent or nearby lands. SEPH recognizes that there are significant knowledge gaps for the locations of these stands and will work collaboratively with scientific experts to identify and map locations of primordial old growth forest stands within its area of operation. **–do you have specific experts in mind? What is the timeframe over which this will be done? 5 years? 10 years? Built into planning cycle?**

Question 10.
Are there ecosystems, that are poorly represented in protected areas, and likely to become rare in an intact state due to ongoing human activities?

- **No comments**

Question 11.
Are large landscape level forests (i.e. large unfragmented forests) rare or absent in the forest ecoregion?

- ***Existing connectivity zones within SEPH's area of operation are shown in Fig. 4-43 –*** **what is the reason these are mainly limited to the Crown vs. freehold portion of the management area? FSC standard applies to all lands managed by the company so is there a reason there are no (less) CMZ around the freehold portion?**

QUESTION 12
Are there nationally/regionally significant diverse or unique forest ecosystems, forests associated with unique aquatic ecosystems?

Management Approach

- *SEPH will follow its watershed guidelines and maintain at least 90% of the St. Mary's River and Margaree River watersheds in a natural condition for restoration, and will establish 200m Acadian forest restoration zones (i.e. non-intensive management) along all main watercourses. High-priority patches identified by the CSFF process as candidate protected areas within these watersheds will be deferred from harvesting as per Category 3, question #10.* **– this is confusing eg. to me, "maintain in a natural condition for restoration" would preclude commercial harvesting but then later it says only the high priority patches will be deferred from harvesting. Need to clarify what "natural condition for restoration" means.**

- *SEPH will examine information from the Department of Agriculture to identify the locations of important salmon and brook trout streams* **– would they not already be doing this as part of managing the fisheries values on the forest? eg. if there is existing fisheries data, wouldn't you already be using it?**

Categories 4&5 are incomplete? – the report should be finished prior to certification

Review of NPPH HCVF Sections 4, 5 and 6
R. Burkhardt
March 2009

General Comments

- Without more specific references to policies, guidelines, BMPs, etc. referred to in the report, it is difficult in places for a reader (eg. not familiar with the local management framework) to understand in some cases the context for HCV decisions.

- It would be helpful to identify the specific documents/guidelines that govern certain management decisions and activities (eg. related to water quality management, fisheries, soil erosion and site protection, etc) and differentiate which standards apply to Crown versus freehold lands if there is a difference – it's not clear

- Should source the rationale used in HCVF decisions eg. why was closed forest area defined as 12 years or 2m in height? Why was 30% slope identified as the limit where harvesting activities could occur? How are maps of hydrological features used and assisting in minimizing impacts to soil and water?

Question 17

- These sections of the report tend toward the very general – most of the section do not give many specific examples of how NPPH is currently seeking the information as required for a comprehensive HCVF assessment (eg. there are references to processes/initiatives that date back to 1992 and 1998 like the Crown land IRM, 1997 Netukulimk GIS Management Project) – what is the company doing currently to fulfill its requirements to document HFVF on ALL managed lands? Or be more clear about which of these processes are ongoing.

- While I appreciate that in some cases, there may not be existing information of some of the values as required (particularly for freehold lands), I did not get the impression from reading this report that NPPH is being particularly pro-active in filling those information gaps, specifically as regards social and cultural values on the managed forest area

- *"One approach that NPPH will take with identifying critical societal values will be through a series of public open house sessions planned for 2009 and early 2010. These open houses reflect the company's effort to manage its forests in ways that reflect the desires and values of the people living in eastern Nova Scotia. As the company prepares its next Sustainable Forest Management Long-term Plan in 2010, the company will be seeking input on its activities and objectives for its forests."*

- I think the approach needs to be outlined in more detail eg. as to how values will be identified and documented in the FMLTP. How will the company seek input? How will they track it? How will it be linked into operational planning? How is it a

dynamic process? Values are not static. Does the company have advisory committees? Annual public meetings? What fora exist for communities to input values?

- What is NPPH doing to collect values information on the freehold portion of the managed forest area (as opposed to Crown lands)? Or is it similar for all lands? Clarify.

- *Re: Third-party use of Crown and freehold lands:*

- Where are the details/description of the use documented (and is there a link to the GIS system?) Is this information used in planning and if so, how?

- *Re: Trails and Users*

- Where is trail use documented? Who maintains trails maps? How are these incorporated into forest management planning?

Question 18

- While I appreciate that there have to be willing participants, more references to what has specifically been tried would be helpful. The report leaves the impression that not much has been attempted in terms of communications/discussions with local FN communities to address their interests (if any) on the managed forest area, Crown land or otherwise - it does not strike me that a pro-active approach has been applied here

- Table 4-16 provides very general information that doesn't link in any real way to the forest management area eg. – has the company actually identified any areas that may be of importance for these uses eg. significant concentrations of birch, waterfowl concentrations areas, medicinal plant locations? Is there an existing values layer that tracks any cultural uses as they are identified? Or what is the plan for collecting this information in future? Or what is the approach to risk management in face of unknown values?

- How are the known archaeological site locations considered when planning forest operations or is this not an issue? Clarify.

Re: The Netukulimk GIS Management Project

- *The GIS data was not provided to the company as decided by the project participants.* – WHY? Elaborate.
- *A similar project for public lands beyond First Nation community boundaries would be very beneficial to both the Mi'kmaq people and NPPH* – and what is being done to pursue this?

Re: Unama'ki Resource Mapping Project.

- It is not clear how this project (or the Netukulimk Project) relates to NPPH lands and whether the information will be relevant/available to NPPH

HCVF Decision

A Mi'kmaq values mapping assessment can only be completed with the interest, support and cooperation with willing communities. Additional work for the identification and mapping of cultural values is required for HCV categories 5 and 6. Therefore, no specific forest area is identified as an HCV at this time.

- It is not adequate to say a) there is no available information and b) additional work is required, without them laying out a more specific strategy or plan for how NPPH will at the very least do its due diligence in trying to meet the HCVF report requirements. The report gives the impression that NPPH has no idea of how First Nations use the forest today or if they even use it. What is the relationship between the communities and the company with regard to forest management? Not clear. Even assuming the communities had no interests, this should be more explicit if this is the case.