

ADDITIONAL INFORMATION REQUIREMENTS

EPR for Proposed Amendment to Operating Plan (1997-2001) for FMD 16
Main River - Sheffield Lake Areas
Proponent - Corner Brook Pulp and Paper Ltd.
June 7, 2000

2.0 Project Description

Section 2.2.3 Residual Areas to Remain Unharvested (Page 9)

The area of Gap Replacement/Old Growth Forest that will remain unharvested in District 16 and the area of Gap Replacement/Old Growth Forest which has already been harvested in District 16 should be quantified and identified on mapping of appropriate scale to allow readers to easily identify these areas.

Page 9 refers to Figure 2.2. To illustrate the points discussed, a coding should be added to the map to show areas that have been harvested and those left unharvested.

Section 2.2.4 Harvesting Methods (Page 10)

This section describes manual and mechanical harvesting. The proponent should include in the description an estimate of the extent to which each method will be employed.

Section 2.2.6 Access Roads and Watercourse Crossing (Page 11)

The proponent should indicate whether these access roads will be decommissioned or maintained for future operations

Section 2.2.8 Next Five Year Operating Plan (2002-2006) (Page 13) & Section 4.7 Forest Structure

Recognizing that the proponent can not make definitive statements about future harvesting, it would be useful to identify on a map, areas where CBPP has harvesting rights in the Main River Watershed and the eastern Northern Peninsula. These areas should then be related to the area of forest which would be harvested in the Amendment area.

3.0 Rationale and Alternatives

Rationale/Need

The EPR states (Sec. 2.2.2) that CBPP plans to harvest 60,000 m³ of wood in the Main River area during the springs of 2000 and 2001. The proponent should confirm whether there was a shortfall of spring wood in 2000 and whether there is a shortfall for 2001. If spring wood was obtained from other locations, the proponent should relate this activity to why harvesting in the Amendment area is still required.

The proponent should state whether the rationale for the project has changed. The rationale should be presented as it relates to the inventory shortfall, spruce/fir ratio in the inventory, road construction issues, the need for a supply of fresh wood fibre, and the schedule for harvesting. Any other factors which may relate to the rationale should also be fully discussed.

Reference should be made to whether roads which were constructed several years ago now require upgrading and if so, the level of effort and time to do so.

Section 3.1.1 Alternatives to the Project (Page 18)

Should the proponent confirm that a shortfall of wood no longer exists then a re-evaluation of alternatives should be provided. The evaluation should include a detailed discussion of the advantages and disadvantages of all alternatives in terms of scheduling, operational factors, environmental factors and others. In particular, the proponent should provide information on the remaining Annual Allowable Cut volumes in approved harvesting areas and whether a surplus exists in these areas. The proponent should provide detailed information, including specific locations on maps, of any surplus in currently approved harvesting areas and discuss relative to the need for the Amendment.

The alternative of importing wood should take into account any change to the anticipated timing of the harvest in the Amendment area. Consideration should be given to the possibilities of sourcing wood from elsewhere on the island, of exchanging wood with or accessing wood of another company, or of accelerating the harvesting schedule to eliminate the shortfall.

In the section on “availability,” the proponent states that it is not likely that an application to import wood from Quebec would be approved in time for the Spring of 2000. The EPR should clarify what approvals are required and the length of time which may be required to obtain approval following submission of an application.

The section on “negative economic effect” states that importing wood would mean the loss of local economic benefits from local forestry operations. The proponent should discuss whether the overall economic effect of importing wood would be positive or negative if the importation facilitates maintaining operation of the mill.

This section refers to “significant layoffs at the mill and considerable indirect negative effects to contractors and suppliers to woodland operations” in the event of the “no action” alternative. The section should elaborate on the direct and indirect negative effects.

Section 3.1.2 Alternatives within the Project (Page 18)

The Guidelines (Section 3.0) require an analysis of alternative methods of carrying out the project. This should include a description of alternative harvesting methods including clear-cutting and methods which mimic nature. The proponent should explain why clear-cutting is the preferred method.

4.0 Existing Environment

The description of the migratory birds should include the red crossbill. The proponent should review existing literature for information on the presence of red crossbill within the Amendment area, and indicate whether suitable habitat exists there.

Section 4.2 Newfoundland Pine Marten (Page 30) and Table 4.10 (Page 64)

As the pine marten is an important component of the Main River ecosystem, (Section 4.2 page 31) it would be useful to show sites where pine marten were trapped to indicate how the habitat they use will be impacted by the harvesting. Few details of the Pine Marten Study are provided in the EPR. The Study should be fully described including, but not limited to, the duration of the study, a description of areas of marten habitat which will remain unharvested together with appropriate mapping. The description should address the value, if any, of the unharvested habitat for other VECs. The proponent should also state what type of commitment they are prepared to make in relation to the Study. The relevance, if any, of the Study to the prediction of a minor (not significant) residual environmental effect upon marten should be discussed.

Section 4.7 Forest Structure (Page 47)

The guidelines ask for (i) the area of contiguous undisturbed old growth forest remaining in District 16, and (ii) an estimate of the remaining old growth forest this represents for the island of Newfoundland. Section 4.7 of the EPR, Forest Structure is provided to address these questions. There is a discussion of total forested area, but there is no mention of the areas that are contiguous. This information should be presented to facilitate assessment of the level of forest fragmentation and related impacts on forest ecology. The proponent should also attempt to quantify the proportion of this forest type in District 16 in relation to the rest of the island of Newfoundland.

The proponent states in Table 4.10 that the forest, once cut, will regenerate to another old-growth gap-replacing forest. The proponent should support the statement taking into account that the area has not been previously harvested or

experienced any known natural catastrophic disturbances. The supporting argument should also take into account maintenance of biodiversity and the relationship of ectomycorrhizal fungi to regeneration.

Section 4.9.6 Non-Consumptive Avifauna (Page 62)

The guidelines also require information on the migratory birds (including forest songbirds) that are found in District 16. The list of species provided in the EPR section 4.9.6 Non-consumptive Avifauna (Forest Birds) is incomplete, missing common species, as well as potentially ecologically significant species to the area.

It is the intention to include all migratory birds as defined under the Migratory Birds Convention Act. A list of these species is available from the Canadian Wildlife Service, and includes forest birds.

Section 4.10 Present and Known Future Resource Uses (Page 64)

The Guidelines indicate that "a qualitative and quantitative description of the present and known future resource use(s) and identification of known data gaps is essential." This is discussed in the EPR in Table 4.10 but a further discussion is warranted. The proponent should address whether increased access from forestry operations is likely and predict impacts of any increased access upon the resources and tourism experiences within the Amendment area.

5.0 Impact Assessment

Section 5.4.2 Main River and the Canadian Heritage River System (Page 82)

It would be appropriate to state that while the CHRS board accepted in 1991 the protected area corridor brought forward for the Main River, it was with the understanding that activities which occurred outside the corridor that resulted in potential negative impacts on the natural and recreational values for which the River was nominated would be managed by Government in a manner that mitigated these impacts. The EPR should address mitigative measures for impacts on viewscapes with respect to the Amendment area near the bridge.

Section 5.4.8 Cumulative Effects (Page 116)

The requirement is to address cumulative effects on all environmental components listed in Section 4.0 Existing Environment of the guidelines, including Newfoundland Marten, Canadian River Heritage System nomination for the Main River, Navigable Waters, Tourism/Recreational Activities, Forest Structure, Migratory Birds, and Other Wildlife (including forest birds).

The cumulative effects section should take into account all forest harvesting activities in District 16. This would include previous activity, if any, by Abitibi Consolidated and the Department of Forest Resources and Agrifoods (DFRA). This information is available through the DFRA. Mention is made only to the activities of CBPP's current five year operating plan, and amendments. This section should consider the potential for impacts on Gros Morne National Park by the cumulative effects of forest harvesting in the Amendment area and District 16.

Section 5.0 of the guidelines states that the proponent should discuss how an overall forest mosaic that provides adequate habitat diversity will be maintained. Addressing this issue depends upon addressing issues such as cumulative effects and contiguous forest (forest fragmentation).