Environmental Evaluation of the Proposed Five-Year Operating Plan for Forest Management District 16 (2002-2006)

Submitted to:

P.O. Box 8700 St. John's. NF A1B 4J6

Submitted by:

Corner Brook Pulp and Paper Limited P.O. Box 2001 Corner Brook, NF A2H 2S1

Prepared by:

AMEC Earth & Environmental Limited 95 Bonaventure Avenue P.O. Box 2035 St. John's, NF A1C 5R6

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EXECUTIVE SUMMARY

Corner Brook Pulp and Paper Ltd. (CBPP) has submitted its Five-Year Operating Plan for Forest Management District 16 (FMD 16), a large area that includes the watersheds of the Humber and Main Rivers. This Environmental Assessment document is submitted in support of the registration of this Plan under the *Environmental Assessment Act*. This document provides relevant environmental information regarding the proposed Five-Year Plan and provides an environmental evaluation of its contents and its implementation.

The proposed undertaking involves continued forest harvesting activities within FMD 16. These activities involve the construction and maintenance of forest access roads, harvesting and transportation of softwood to the mill in Corner Brook, and silviculture activities for the period 2002 to 2006 inclusive. The undertaking involves the harvesting of wood volumes set by the provincial Department of Forest Resources and Agrifoods (DFRA) as sustainable within FMD 16.

DFRA manages the timber resources of the Province by focussing on the recovery of material in an efficient manner and the optimal use of wood fibre. Therefore emphasis is placed, for example on harvesting over-mature and mature trees (i.e. harvest the oldest wood first), and on recovering trees which have been damaged by blowdown, fires and/or insect infestation before they are lost to rot and decay. The industry operates in compliance with this objective, and accordance with a comprehensive planning framework – a twenty-year overall plan as developed by DFRA, individual Five-Year Operating Plans for Forest Management Districts, and Annual Operating Plans with assignment of annual allowable cut limits to ensure against over-exploitation of the resource. A ten-year strategic document has also been recently developed and drafted for FMD 16 that outlines guiding principles of sustainable, multi-use forests.

Five-Year Operating Plans for FMD 16 have been developed by each proponent CBPP, Abitibi-Consolidated, and DFRA. All are required to undergo examination in accordance with the requirements of the *Newfoundland Environmental Assessment Act (NEAA)*. As well, any proposed amendments to these plans must be registered in accordance with the Act.

The documents listed above are produced under the Adaptive Management Process outlined by the Department of Forest Resources and Agrifoods. Adaptive Management is a process of continual reassessment of management objectives and procedures to ensure continuous improvement. As such, research and policies are continually being "upgraded" as necessary.

Proposed Five-Year Operating Plans are developed by each proponent (i.e. CBPP, Abitibi-Consolidated (Abitibi), and DFRA) and all are required to undergo examination in accordance with the requirements of the *Newfoundland Environmental Assessment Act* (NEAA). As well, any proposed amendments to Plans must be registered in accordance

with the Act. As part of the Adaptive Management Process, public planning meetings are conducted prior to development and submission of all Five-Year Plans for each forest management district. Prior to this submission, CBPP and other proponents completed 17 public planning meetings and two one-day workshops throughout communities in FMD 16 so that issues from interested and concerned individuals, government agencies, and non-government agencies could be addressed. This process began over 12 months ago as a combined process for all parties interested in pursuing forest harvesting operations in FMD 16. This is an integral process in addressing concerns prior to submission of any proposed Five-Year Operating Plan. In this way, issues and concerns regarding specific identified harvesting areas (eg. hunting lodge locations) and district-wide concerns (eg. Pine Marten and Forest Structure) have been considered and resolved prior to submission.

The current proposal is straight-forward. CBPP is proposing to continue its operations in FMD 16 in a sustainable manner. FMD 16 is an integral timber supply for the CBPP mill as it supplies approximately one-quarter of their annual timber consumption.

This Environmental Evaluation provides a discussion of various issues identified through the public planning meetings. The level of public participation is endorsed through the Adaptive Management Process. Each issue has been subjected to an evaluation using the available information on the issue from within the areas of concern as well as relevant literature on mitigation practices from around North America. Some issues identified are addressed within the scope of regulations from federal and/or provincial agencies. As such, permitting requirements, laws, and mandatory mitigation measures from both Provincial and Federal government agencies govern environmental aspects of forest harvesting operations of all companies in Newfoundland and Labrador. These requirements are based on current knowledge and corrective and preventative techniques that reduce or eliminate potential negative effects. Where these regulatory requirements are applicable to identified issues (eg. Navigable Waters, Historic Resources, Fish and Fish Habitat), they will be presented and incorporated into the evaluation.

For all appropriate issues, mitigation measures have been identified and a prediction made of the residual impact of the undertaking. It is recognized by CBPP that forest harvesting operations can never be conducted without any effect to the forest in question, however, in no case is the predicted impact significant for any identified major concern, given the commitments made by CBPP through the Adaptive Management Process.

The principal concerns regarding this Five-Year Plan submission are summarized below.

The **forest structure** within the Main River watershed has been identified as old growth boreal forest with gap replacement as the dominant regeneration dynamic. CBPP timber limits cover some 69% of the Main River watershed. The remaining 31% of the watershed is unalienated Crown land that is not scheduled for harvest. The Company

has contributed more than 17,000 hectares of their limits to the Heritage River Special Management Area. More than 12,000 (12% of the watershed) hectares of this are is in no-cut zones. Nearly half (42%) of the watershed is not scheduled for harvest and another 5% will only be harvested under the auspices of the Main River Stewardship Agreement. The estimated extent of the contiguous old growth forest on the island has been determined to be much larger than the Main River watershed. This large area combined with the no harvest area of the Main River watershed provides ample opportunity to protect a representative area of this forest type. Commitments have been made by CBPP to ensure that this Newfoundland ecosystem is maintained:

- Harvesting a limited amount of timber within the Main River watershed. In total, approximately 25,000m³ of wood will be extracted from the watershed annually.
- No clear-cutting within the Main River watershed. Various non-clearcut regimes will be conducted within the watershed. Harvest will be based on maintaining the uneven aged forest structure found there. Specific harvest methods may vary from stand to stand depending on the structural characteristics of each stand.
- A contribution of more than 17,000 hectares to the Main River Waterway Park and Special Management Area.
- Continued research and protection of this ecosystem.

A portion of the Newfoundland **Pine Marten** population is found within FMD 16. The species is listed as endangered by the Committee On the Status of Endangered Wildlife In Canada. CBPP cooperates with the Wildlife Division of the provincial Department of Tourism, Culture and Recreation for the recovery of Marten throughout western Newfoundland. The Company provides financial and in-kind support, jointly with other stakeholders, for several major research and management initiatives for the Pine Marten. Company staff serve on the Newfoundland Marten Recovery Team. A key objective of the partial harvest strategy is to conform to the new habitat guidelines developed by the recovery team.

Many other **Wildlife** species occur throughout Insular Newfoundland including birds, mammals and fish. An outline of current surveys and research is presented as well as the potential interaction between forest harvesting and each group. In most cases, a neutral or positive effect from forest harvesting is expected due to increases in the productive capacity of the regenerating forest (eg. moose and small game).

Tourism activities represent an important resource use in FMD 16. The recent designation of the Main River as a Canadian Heritage River will provide a base for an expanded eco-tourism industry in the White Bay South area. The Management Plan for the Heritage River calls for the formation of a Stewardship Committee to provide input to the Department of Tourism, Culture and Recreation on the management of a 200 square kilometre Special Management Area along the full length of the river.

Corner Brook Pulp and Paper is involved in ongoing meetings with the Department of Tourism, Culture and Recreation and the Newfoundland Outfitters Association to discuss harvesting plans in the Upper Humber/Main River area (see Five-Year Operating Plan Volume One). Separate follow-up meetings with individual outfitters have also been held. CBPP has made a commitment to ensure that forest harvesting and outfitting operations can work together without any significant constraints or conflicts.

The forest industry is a mainstay of the Newfoundland economy and Corner Brook Pulp and Paper is a significant part of the forest industry. The Company employs some 1,500 people directly in 40-50 communities throughout the province in high quality, long-term employment. The Company's annual payroll is in excess of \$63 million. Most employees work 10-12 months a year at wages that are significantly higher than the provincial average. Including wages, CBPP spends some \$100 - \$150 million annually on goods and services in Newfoundland and Labrador and contributes more than \$300 million to the province's Gross Domestic Product. Forest management activities in FMD 16 support more than 200 jobs in the Company's mill and woodlands operations. As well, CBPP provides logs to integrated sawmills in FMD 16, thus supporting significant additional economic activity and the associated employment in the district.

In summary, Corner Brook Pulp and Paper has made significant changes to its approach in managing its timber resources in the Main River watershed. No clear-cutting will take place in the watershed. All harvest will be some form of selection or variable retention harvest that will retain key structural elements of the existing forest stands. There will be no conversion of uneven-aged natural stands to even-aged, intensively managed stands. Harvest volumes will be minimized with some 25,000 cubic meters harvested annually. CBPP supports the protection of a representative area of the old growth forest ecosystem found on the eastern side of the Northern Peninsula. Nearly half (42%) of the Main River watershed is not slated for harvest. Additional areas of similar forest occur north of the Main River watershed and provide ample opportunity for protection of a representative, undisturbed area of this ecosystem. CBPP has contributed more than 17,000 hectares of its timber limits to provide for the designation of the Main River as a Canadian Heritage River. This designation was granted in August 2001 and will protect the natural and wilderness values along the full length of the river and provide for an expanded eco-tourism industry in the White Bay South area. Through the formation of the Gros Morne National Park Connectivity Working Group, the Company is working with the Park to ensure that forest management activities adjacent to the park do not negatively impact its ecological integrity. CBPP continues to co-operate with the Wildlife Division of the Department of Tourism, Culture and Recreation to ensure the provision of sufficient suitable habitat for the recovery of the Newfoundland Pine Marten in western Tourism and recreation are important values derived form Newfoundland's forests. CBPP works with individual outfitters and the Newfoundland Outfitters Association to address their concerns with forest management activities on company timber limits. Forest management activities in FMD 16 support a significant portion of Corner Brook Pulp and Paper's contribution to the economic and social benefits derived from Newfoundland's forests. Corner Brook Pulp and Paper strives to achieve a balance of economic and environmental values such that no significant residual impacts on the Valued Ecosystem Components should result from the implementation of the proposed Five-Year Operating Plan.