

**ENVIRONMENTAL PREVIEW REPORT
ON THE PROPOSED
AMENDMENT TO THE CURRENT FIVE YEAR
OPERATING PLAN (1997 – 2001) FOR DISTRICT 16
MAIN RIVER AND SHEFFIELD LAKE AREAS**

Submitted to:

**Department of Environmental & Labour
P. O. Box 8700
St. John's, NF
A1B 4J6**

Submitted by:

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

Prepared by:

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

**March 27, 2000
TF07102**

EXECUTIVE SUMMARY

Corner Brook Pulp and Paper Ltd. (CBPP) has applied for an Amendment to its Five Year Operating Plan for Forest Management District 16, a large area which includes the watershed of the Upper Humber River and Main River. The Minister of Environment and Labour, in accordance with the Newfoundland Environmental Assessment Act has directed that an Environmental Preview Report be prepared. This document is submitted in fulfillment of the requirement, and is intended to comply with Guidelines released by the Minister on February 10, 2000.

The proposed Undertaking involves the relocation of operations within FMD 16, mainly to allow wood harvesting and delivery to the mill to continue throughout the 2000 and 2001 Spring periods. The undertaking does not involve any increase in the quantity of wood to be harvested. It does not affect other Forest Management Districts, and it does not extend beyond 2001, ie the period covered by the current Five-Year Operating Plan for FMD 16.

The existing system for forest management flows from a twenty-year plan (1996 – 2015) which has been developed for the Province by the Department of Forest Resources and Agrifoods (DFRA). Five year operating plans for each Forest Management District (FMD) are developed within the context of this twenty year plan, as are the annual wood harvest allocations which are set by DFRA for each FMD. Each proposed Five-Year Operating Plan is required to undergo examination in accordance with the requirements of the Newfoundland Environmental Assessment Act (NEAA). As well, any proposed amendments to the Plan must be registered in accordance with the Act. The current Five-Year Operating Plan for FMD 16 includes harvesting in the Main River watershed, as well as in other areas throughout the FMD. The plan covers the period up to the end of 2001.

DFRA manages the timber resources of the Province, and this includes focusing on recovery of material in an efficient manner, and with optimal use of wood fibre. Therefore emphasis is placed, for example on harvesting over-mature and mature trees (i.e. take the oldest wood first), and on recovering trees which have been damaged by blowdown, fires or insect infestation. The response to such unanticipated events can result in changes to the operating plans. The industry operates within an effective planning framework – a 20 year overall plan as developed by Forestry, individual five year plans for forest management districts, and annual plans with assignment of annual cut limits to ensure against over-exploitation of the resource.

The industry also recognizes that forests represent valuable ecosystems that need to be protected. In order to address key challenges of achieving sustainability with respect to economic as well as environmental integrity, CBPP subscribes to sustainable forest management practices. Consistent with the principles of sustainability, CBPP is an active participant in research and environmental protection measures which address issues such as protection of rare and endangered species (eg Pine Marten), support for wilderness preservation (eg designation of Main River Protected Corridor), integrated resource management principles (ecotourism, recreation, outfitting/hunting), landscape design planning (e.g. for Main River Lodge) and protection of ecosystem integrity (Model Forest).

The key challenge for achieving sustainability is not to make either-or choices, but rather to find the means to balance economic and environmental imperatives.

The current proposal is straight forward. CBPP is requesting approval to change location of its wood harvesting activities, not to increase the allowable volume of harvest. This requirement is to enable wood harvesting to continue through the Spring period when many woods roads are not suitable for traffic. The mill has an inventory shortfall as a consequence of the labour dispute which occurred last year. Normally, the inventory can sustain the mill through the Spring period when the flow of supply is reduced due to thaw conditions. The proposed amendment area in the Main River watershed has an existing network of high quality roads which can sustain Spring traffic, in part because the subgrade is not sensitive to frost heave.

The proposed wood harvesting of the Main River/Upper Humber area was subject to a comprehensive Environmental Impact Assessment Process, which resulted in a number of important mitigation decisions, all of which generally remain in effect. These measures included the designation of a protected corridor along the Main River, comprising approximately 7,600ha. The expressed intent of Government has been to declare this area (with some additions of Crown Land), as a Waterway Park, and to develop a management plan for the watershed which would enable the area to be designated as a Canadian Heritage River. CBPP, following its release from the EA process, then commenced building of woods roads in the area. Harvesting was interrupted with the discovery elsewhere of a large volume of blow-down timber which needed to be recovered before rot set in. This is an example of the adaptive approach which is required in order to implement efficient wood harvesting programs.

It should be emphasized that the proposed wood harvest program in the Main River watershed has been previously approved, and it will not compromise the nomination process for designation of the River as a Canadian Heritage River. In fact, the attention which this proposed undertaking has drawn may serve to expedite a nomination process which has been ongoing for over a decade.

Similarly, the concern about Pine Marten may result from a lack of knowledge about the measures in place to protect this species, and to develop a better understanding of critical limiting factors. CBPP is a participant in an MOU which supports a research program in the Main River area. A large scale monitoring program using tagged animals is attempting to understand the habitat requirements of the species. Defined areas will be subject to wood harvesting so as to provide information on the suitability of various habitat types, and successional stages of vegetation.

Most of the forest areas in Newfoundland (less so in Labrador) have been subjected to periodic incidents of wide spread losses of the canopy trees, usually as a consequence of forest fires or insect infestation, and more recently through wood harvesting. The maximum age of trees within most forest stands reflects the frequency of this cycle. The forests along the eastern side of the Northern Peninsula include some very old trees, in part because of the absence of these phenomena. Such a forest type is not common on the Island of Newfoundland, and there is little information on the overall distribution of 'Gap Replacement' forest, as it is known. The available information, however confirms that this forest type is present over at least a major proportion of the Northern Peninsula, extending along the eastern side of the peninsula from Cloud River in the north, to Main River in the south, an area of approximately 4,800km².

Using conservative figures, this forest type can be placed in context. The total coverage by this forest type in insular Newfoundland is at least 60 000 ha (based only on estimates for the Northern Peninsula). The Main River Protected Corridor (and adjacent buffer zones) contains an estimated 3,500ha, or 6 % of this total. The proposed undertaking will harvest from an estimated 1 500 ha, or 2.5 % of the total. While research would be required to gain a better quantification of the extent of this forest type, it is clear that the proposed undertaking does not threaten the viability of the Gap Replacement forest.

In planning this work, CBPPL has reviewed and revised the project so that mitigation has been "built in" rather than "added on". For example, through consultation with the only outfitting operation in the harvest area, the road routing has been adjusted so as to protect the wilderness aspect of that operation. In fact it is expected that, as is the case with the existing road network, the modest extent of new woods roads (5 km total in Main River; 8 km total in Sheffield Lake) will be complementary to ongoing recreational and tourist activities in the area, including snowmobiling, canoing/kayaking, angling, and hunting. .

The EPR provides a discussion of eight issues identified in the Guidelines, as well as a number of others which emerged from the public consultation program conducted by the company. Each issue has been subjected to an evaluation of the available information. While some information gaps occur, these are not of such a magnitude as to prevent the prediction of impacts, but rather relate to the type of information which would be collected in support of the applications for permits and authorizations which follow after the release of the undertaking from NEAA. Mitigation measures have been identified where appropriate, and a prediction made of the residual impact of the undertaking. In no case is the predicted impact significant.