



**GOVERNMENT OF
NEWFOUNDLAND AND LABRADOR**

Department of Environment

**Honourable Ralph Wiseman
Minister**

GUIDELINES FOR ENVIRONMENTAL PREVIEW REPORT

Issued 2002 02 26

Five Year Operating Plan (2002 -2006)

Main River Watershed

Corner Brook Pulp and Paper Limited

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1.0 Introduction

On December 19, 2001 the Minister of Environment required Corner Brook Pulp and Paper Limited (CBPPL) to submit an Environmental Preview Report (EPR) for that portion of Forest Management District 16 within the Main River Watershed. An EPR presents the results of an investigation based on readily available information that supplements the information provided by the proponent upon registration of the undertaking. The purpose of the EPR is to provide sufficient detail for the Minister to determine whether there may be significant environmental effects from the undertaking, whether an Environmental Impact Statement is required, or whether the project may be released from the environmental assessment process.

These Guidelines have been prepared in accordance with the *Environmental Assessment Act, 2000* to assist the proponent with preparation of the EPR. In the Guidelines, information requirements are listed under headings. It should be noted, however, that these requirements may overlap between one or more of the headings. For example, forestry issues which also apply to Gros Morne National Park may only appear under Forestry.

2.0 Format and Submission

The EPR should focus on information gaps identified during the review of the registration as described in these Guidelines. Gaps which cannot be filled within the context of the EPR should be identified.

The summary of the EPR should use non-technical language and be readily understood by the general public. The language in the entire EPR should take into account that the EPR will be reviewed by the non-technical public in addition to technical reviewers.

The EPR, when submitted, will be available for a 35 day public review in accordance with the *Environmental Assessment Regulations, 2000*. The Regulations provide that the Minister's decision is due not more than 45 days after the EPR has been submitted. The proponent shall initially submit 80 paper copies of the EPR and 20 electronic copies on compact disks. Additional copies may be required depending on demand. In addition, an electronic copy suitable for posting on the Department Website is required.

Paper copies shall be printed double-sided on recycled paper. Maps should be scaled for ease of readability, fit letter-size paper where practical, include co-ordinates, a north arrow, and labelling of major geographic features. Project-related documents shall be included in a bibliography which identifies any documents of a proprietary nature. System International (SI) units of measure and terminology shall be followed in the EPR.

3.0 Adaptive Management Process

- 3.1 The Environmental Evaluation (Executive Summary, pg. ii) states that there are no significant impacts predicted from forest harvesting operations “given the commitments made by CBPPL throughout the Adaptive Management Process”. The Evaluation (Section 4.3, p. 104) further states that certain valued ecosystem components “do not require further evaluation as they are dealt with through Adaptive Management”. While the Evaluation (p. i, ii, 2, 132, and 147) gives a summary of the adaptive management approach it does not adequately explain how the approach would be used to mitigate impacts to the minor (insignificant) levels which are predicted in the Evaluation. The EPR should describe adaptive management and demonstrate how the proponent’s participation in that process will result in no significant negative impacts.

The explanation of the adaptive management approach should be consistent with the objectives of adaptive management presented in the Forest Management District 16 Strategy Document¹, and should address processes for designing experiments and developing hypothesis to achieve the objectives. In addition, the EPR should address the role of monitoring and how monitoring may determine the need for further management action. Agencies, academics and other research efforts which would contribute to the adaptive management process on an ongoing basis should also be addressed.

4.0 General

- 4.1 Section 2.1 (p. 9 -10) of the Environmental Evaluation states the percentage for the CBPPL mill’s total annual timber requirements which is provided by FMD 16. The EPR should state the percentage of the mill’s annual timber requirements which would be provided by proposed harvesting in the Main River Watershed.
- 4.2 The EPR should provide an overview map of the Main River Watershed which includes a UTM or co-ordinate grid, legible names for operating areas, labels for waterbodies and communities, and the boundary of the Watershed.

¹ This Document is available from the Department of Forest Resources and Agrifoods.

- 4.3 Corner Brook Pulp and Paper Ltd. has recently announced an independent Science Advisory Group to advise on forest harvesting within the Main River Watershed. The EPR should indicate the membership, objectives, mandate and terms of reference for the Science Advisory Group, and indicate the timeframe associated with the Group's operation.
- 4.4 The Environmental Evaluation (Section 4.0) addresses mitigative measures for potential effects, rehabilitation plans, and monitoring associated with the Five-Year Plan. But the Evaluation does not state whether CBPPL regards these procedures as corporate commitments. This should be clarified in the EPR.

5.0 Forestry

- 5.1 The EPR should address, in detail, how the proposed forest harvesting activities are linked and integrated with the guiding principles, goals and objectives of the Forest Management District 16 Strategy Document. The EPR should also describe current and proposed research efforts and studies that are linked with and contribute information regarding the proposed harvesting.
- 5.2 For 2002, the EPR should identify harvest strategies which will be employed, rationale for the preferred strategy(s), and harvest volumes for specific operation areas within the Main River Watershed. The EPR should also include results of ongoing studies on the environmental effects of the proposed harvest strategies.
- 5.3 To the extent possible, CBPPL should also provide a projection of the anticipated harvest strategies, rationale and harvest volume for specific operation areas within the Main River Watershed annually for the remainder of the Five Year Plan (2003 -2006). If this information cannot be provided in whole or in part, reasons should be provided in the EPR.
- 5.4 The maps included with the Registration do not include forest age classes. To facilitate impact predictions upon migratory birds and species at risk, CBPPL should provide mapping with 20 year forest age-class structure.
- 5.5 The harvest volume on the operating area data sheets for District 16 in the Five Year Plan is shown as 1,603,797 m³ while the text indicates a harvest of 1,000,000 m³. The EPR should clarify this apparent discrepancy with reference to harvest volumes proposed for the Main River Watershed.
- 5.6 The EPR should provide details of proposed road construction for the Main River Watershed and explain road construction requirements in relation to proposed harvesting.

- 5.7 The overview map in the Five Year Plan shows Alienation Class 3 for much of the Main River Valley but the detailed mapping indicates modified harvest in some areas. CBPPL should clarify this apparent discrepancy.
- 5.8 Section 3.2.5.5 (p. 42) of the Environmental Evaluation estimates that an area of 5,400 km² of old growth forest exists on the eastern Northern Peninsula. It is further estimated that “the area identified for potential harvest within the proposed Five-Year Plan in the Main River Watershed is approximately 1% of the potential old growth.” The EPR should clarify the basis for this comparison and whether this estimate takes into account that the two areas may include non-forest areas such as waterbodies, barrens and peatlands.

6.0 Wildlife

Pine Marten

- 6.1 The references used to support much of the information presented in the Environmental Evaluation (p. 47-48, 118, and 120) are limited in number. There is a significant body of current literature available from the Northeastern US and Canada on the Marten biology and ecology that is not referenced. The majority of information presented in the sections on life history and mitigation/protection is out-of-date. The EPR should include more recent and in-depth research results to provide a baseline for assessing the potential impacts of forestry operations on marten populations.
- 6.2 The EPR should describe the marten habitat evaluation modeling which CBPPL is currently undertaking with the Wildlife Division, together with an explanation of how results of the modeling will be used to modify future harvesting. The EPR should review impact predictions of forestry operations on marten populations in light of updated research results (Guideline 6.1) and results of habitat evaluation modeling, if available.

Migratory Birds

- 6.3 The EPR should distinguish between the forest structure requirements for “forest interior” and “old/mature forest” birds (p. 14 & 129 of the Environmental Evaluation). Species listed in the “Interior Habitat Selection Guild” (p. 57 of the Environmental Evaluation) include species that require forest habitat but are not necessarily interior, and impact predictions (p. 34) should be reviewed, taking into account forest structure requirements (interior vs. old) and the revised species list.

- 6.4 Many forest bird species are in decline. The EPR should address the population status of forest birds and identify species in decline that are associated with old-growth and interior forests in Newfoundland. Mitigative measures should be reviewed taking this information into account.

7.0 Outfitting Lodges

- 7.1 The Environmental Evaluation (Section 4.4.4, p. 144) states that a Guiding Principle in the Forest Strategy Document for Forest Management District 16 is to “protect the viability of the current outfitting/adventure tourism businesses and outdoor activities”. The Environmental Evaluation (Section 4.4.4.7, p. 145) predicts that impacts on select socio-economic issues including outfitters will be minor (insignificant). According to the Evaluation (Section 4.4.4.5, p. 145), this prediction is based upon the proponent’s proposal to work with the Department of Tourism, Culture and Recreation, and the outfitters “to ensure that forest harvesting and outfitting can work together without significant constraints or conflicts.” In the Evaluation, the proposed meetings are considered a mitigative measure and are factored into the residual impact prediction. However, negotiations in past similar situations have not mitigated impacts to an insignificant level and have resulted in operators relocating. Therefore, it is not clear how the proposed meetings can “ensure” insignificant constraints or conflicts and result in a prediction of minor impacts upon outfitting lodges. The EPR should review the impact prediction and provide support for the level of confidence attached to it.

In addition, the EPR should examine the impact of increased accessibility on non-resident hunter expenditure and outfitter revenues using information available from the Strategic Tourism Product Development Division of the Department of Tourism, Culture and Recreation.

- 7.2 The mapping submitted with the Registration does not designate the Northwest Tributary area (the location of four lodges) for modified harvest. This appears to be inconsistent with the proponent’s statement in the Environmental Evaluation that no clear cutting will take place in the Main River Watershed and should be addressed in the EPR.
- 7.3 The EPR should predict the impact of forest access roads on increasing accessibility and hunter crowding taking into account the number of resident big game applications, licence issues, and returns for areas that have become accessible by forest access roads. This information is available from the Wildlife Division of the Department of Tourism, Culture and Recreation.

The EPR should address the status of the “Roads Access Management Strategy” which is a Guiding Principle for Tourism in the Forest Management District 16 Strategy Document. The implications of this strategy for the maintenance of ecological integrity and wilderness values for Gros Morne Park, and the implications for outfitting lodges including identification of opportunities for road decommissioning, should be addressed in the EPR.

8.0 Main River As A Heritage River

- 8.1 The EPR should describe the status of the Stewardship Agreement to protect the natural and recreational values of the Main River Valley.
- 8.2 The environmental evaluation (Evaluation Section 4.4, p. 111) of selected valued ecosystem components (VECs) does not include an environmental evaluation of the VECs which are essential to the Canadian Heritage River designation for Main River. These VECs should be evaluated in the EPR.

9.0 Gros Morne Park

- 9.1 The Environmental Evaluation (Section 4.3, pg. 104) states that impacts upon Gros Morne Park integrity and other valued ecosystem components may be addressed through other mechanisms and do not require further impact assessment. The Evaluation (Section 4.3.5, p. 109) refers to the mandate of the Gros Morne Park Working Group as contributing to maintenance of the ecological integrity of the Park and, therefore, leads to a prediction of negligible (not significant) impacts to connectivity/integrity. The existence of the Working Group is used to justify a preliminary level of assessment in the Evaluation.

However, acknowledging that members of the Working Group have signed a Memorandum of Understanding, it is still not clear whether a high level of confidence can be attached to the impact prediction of negligible impacts. Therefore, the EPR should include an environmental evaluation of the four focus species identified in Section 4.3.5 as requiring further study relative to the connectivity/integrity issue (pine marten, lynx, caribou and passerine birds), and should predict the effects of the undertaking upon connectivity.