

## **Comments relating to Tembec's 20-year Operating Plan and Environmental Impact Statement**

### **Pre-amble**

A significant theme permeating through both documents is the premise that the effects of logging are similar to those created by natural disturbance. Yes, logging does promote landscape diversity, but it fails to “mimic natural disturbance” largely because of access and nutrient suppression issues.

Access to landscapes altered by natural disturbance (fire, insects, disease or wind) is limited to “on foot” travel or where a vehicle is able to blaze a trail, whereas in areas disturbed by timber harvesting, access is provided through a network of primary roads and secondary trails. Not only do these entryways to previously protected areas provide access to hunters, they also provide travel corridors for predators.

If logging enhances wildlife habitat, biodiversity, and ecosystem function, then one should expect productivity, within cervid populations, to be similar to fire? In the Duck Mountain system, large-scale timber harvesting has been ongoing since the early-to-mid 1990s. Since then, twinning rates, which are an indicator of habitat quality, have remained constant while following the 1961 burn, rates increased 3-fold. Even in the absence of anthropogenic disturbance, cervid populations in the Riding Mountain system are thriving despite controlled harvests and culling to manage Bovine Tuberculosis.

Before a solution to a problem can be found, the problem must be acknowledged. If logging was not occurring in the Duck Mountain, Porcupine Mountain or east side of Lake Winnipeg, local cervid populations would not be as stressed as they are. Aerial inventories will be flown this winter to determine how stressed these moose populations are.

Since logging is unlikely to be curtailed any time soon, what can be done to lower the negative impact it is having on large game populations – access control is essential.

How? That's still to be determined; but one might consider:

- Larger operating areas with controlled entry points.
- Cutting from back to front.
- Privatizing all logging roads, not open for public use while logging activities are in effect. Not only would this protect wildlife, it would enhance the safety of workers, especially drivers.
- Decommissioning roads through berms, barrier walls, removal of culverts and bridges, v-plowing...
- Aerial seeding to create a dense understory.

### **Tembec's 20-year Operating Plan (2010 to 2029):**

One would expect the focus of an operating plan to be centered on tree removal. But to find only a dozen or so pages out of a 2,000 page document where big game species are mentioned is a little disconcerting. It illustrates how little consideration is being given to the impact logging is having on

big game populations in Manitoba. It is our understanding that companies do not have a biologist on staff. If they did, they would have someone who is up on the biological literature and who could propose practices that would better meet the needs of industry and ecosystem integrity.

It is interesting to note that most of the literature cited in both documents pre-date 1995? This suggests that the science used in this plan was cut and pasted from older reports. The omission of new science is a major omission and has contributed to some flawed assertions.

### **Section 3.2 Wildlife; 3.2.1 Mammals, Lines 500 to 584**

- **Caribou**

- Line 519 – Although “A significant research program is established on woodland caribou in the FML 01...” there is no mention of the study’s findings. Relying on past published reports ignores the body of data being currently collected and the management considerations which are evolving from the results of this monitoring effort.

- **Moose**

- Line 537 – “...the moose population has increased from 850 to 2,350 animals in the past 15 years in GHA 26...” This statement is inaccurate and needs to be corrected. In 1992/93 (roughly 15 years ago) the estimate was 1,788 not 850 as stated. With a confidence interval of  $\pm 30.5\%$ , the 92/93 estimate falls within the range of the estimate of 2,350 ( $\pm 17.8\%$ ) in 99/00. The inference that the population has increased is not accurate.
- Line 241 & 242 – “MC completed a new moose survey...” and yet the report conveniently left out the result – 1,639 ( $\pm 26\%$ ), which suggests a decline, not an increase. Uncontrolled harvesting associated with uncontrolled access is a key factor, exacerbated by high wolf densities, northward expansion of deer range and fire suppression strategies.
- Line 547 – In order for the following statement to be made – “While moose populations tend to increase as a result of forest harvesting...,” multiple citations are required. In Manitoba it does not and has not held true.
- Line 555 – ... (for a more complete discussion see Kotak and Lidgett, 2004). Crichton et al. (2004) should also be cited along with the findings as the paper discusses the successful Happy Lake access and hunting closure trials.

- **Deer**

- Line 563 – “White-tailed deer, the most important big game animal in North America...” Of what relevance is this statement to Manitoba? Moose are equally or more important in Manitoba particularly in the boreal forest.
- Seven lines does not adequately address the impact that more deer are having on caribou and moose populations. The reason that there are more deer is because habitat is being created through logging. This, in the long-term, negatively effects caribou and moose. At one time, caribou and moose thrived throughout southeastern Manitoba. As deer populations increased, caribou have disappeared and there are few moose. Consideration should be given to slowing down the advance of deer into the northern boreal forest. One option would be to reinforce the natural barrier that the Wanipigow and Bloodvein rivers provide by establishing 5 kilometer no-cutting/development zones on either side of both rivers.

- No scientific papers were cited in this section.
- **Bear**
  - Again, five lines do not adequately cover the impact of having more bears is having on caribou and moose populations. As with deer, logging creates better habitat for bears. As such, as numbers increase so does the predation rate on newborn caribou and moose nullifying whatever benefit the habitat may have provided towards improved reproductive potential.
  - Only one paper was cited and it was from 1987. There's current literature that speaks to increased productivity for bears, smaller home ranges in disturbed areas...

### **Section 5.7 Species at Risk Identified by Other Organizations, Lines 1162 to 1412**

Nowhere in this section were caribou mentioned as Species at Risk. It is odd that The Manitoba Model Forest would “commission a four year breeding bird survey to quantify the abundance, distribution and use of habitats” and yet no studies were commissioned to “quantify the abundance, distribution and use of habitats” by moose?

Line 1206 – “Management practices were assessed and it was determined that bird communities in regenerating areas disturbed by forest fires could not be distinguished from those communities found in regenerating harvest areas. The report authors identified a forest management practise that mimics natural disturbance regimes as one suggested approach. They went on to assume that variable harvest, silviculture and access management prescriptions would result in the safest balance for the future until potential impacts could be quantified further.”

It is arrogant and misleading for anyone to suggest that “forest management practise” can “mimic natural disturbance.” There is a wealth of scientific literature on large game species which proves that this is not true. Planning landscapes by diversifying clearcut size and shape is not a “paint by numbers” exercise. Assuming that “variable harvest, silviculture and access management prescriptions” “mimics natural disturbance” is another real stretch. And to use bird studies to base “best management recommendations” is not in the best interest of “conserving the biological diversity of the boreal forest.” What may be appropriate for birds is not necessarily appropriate for “large game species.”

Now that “potential impacts” have been “quantified,” how far is industry prepared to go to address “access management prescriptions?” As previously pointed out, if there was no timber harvest activities, there would be no access issues.

### **Environmental Impact Statement of the FML 01 (2010 to 2029):**

As with the 20-year plan, it is disconcerting that only a handful of pages out of a 1,000 page document refer to “large game species.”

### **Section 3.3.2 Data Adequacy and Gaps**

Given the importance of moose, wolves and bears, it is disproportionate that out of thirteen sources of information, none were provided for these species. This is an identified data gap.

### **Section 3.3.3.2 Terrestrial Wildlife Species Diversity, Pages 26 to 44**

Page 26 – “With moose being common throughout FML 01, and responding positively to the effects of harvesting activities...” If there’s a body of data that supports the claim “responding positively,” it should be cited here. The datasets WEPB is aware of do not support this statement.

Page 26 – “White-tailed deer, which occur primarily in the southern and western portions of FML 01 adjacent to agriculture lands, is a popular animal for both hunting and viewing. Similar to moose, this species benefits in terms of habitat availability from harvesting activities...” Deer may be benefitting, but certainly not moose. In fact, the northward expansion of deer and the parasites they bring to the boreal forest is contributing to the decline of moose and eventually caribou. What is good for deer is not necessarily good for moose or caribou.

Page 27 – If “Access management is an area of mutual interest for all parties to jointly develop and promote for the benefit of wildlife species...” This section should be expanded to include options that the industry is willing to undertake to avert the negative impact that access is having on wildlife species.

Page 28 – “For moose and white-tailed deer, harvest designs ... positive impacts for habitat.” Harvest designs that benefit deer in the boreal forest are not overall beneficial for caribou or moose.

Page 31 – The HIS model for moose in its current state appears to be flawed. I suggest that the “panel of provincial experts” that formed the “Manitoba Forestry/Wildlife Management Project” be reconvened to assess the model’s parameters and to incorporate any new values. It’s been over 10 years since the model was last tested.

Page 34 – Acknowledging that “forest access roads can have significant impacts upon terrestrial wildlife” is commendable. The reality though is that current access management practices have not been effective at minimizing the “significant impacts.” A frank discussion is needed to agree on additionally measures that would neutralize the “significant impacts” that access is having upon terrestrial wildlife.

Page 38 – “White-tailed deer are not typically a species of the boreal forest, but the development of roads and harvested cutblocks provides new habitats and when there are relatively mild winters as has been experienced recently, their numbers and distribution are expected to expand, particularly in the south.” This is not beneficial for either caribou or moose. Industry is not doing enough to safeguard the ecological integrity of the boreal forest by creating scenarios where non-resident species can be introduced. There are likely other non-native fauna being introduced as well.

Forest companies can not turn back the clock once they have begun harvesting a virgin forest. What they can do is be mindful of the negative impacts and do what is needed to minimize them. Better yet, before they start, all concerned should be having an open dialogue to discuss whether the sacrifices to ecosystem integrity that come with developing previously closed forest communities are worth the economic gains?