

NORTHWATCH

February 19th, 2009

Brian Polhill, FMP Improvement Specialist
Ministry of Natural Resources
Forest Division, Forest Management Branch
Forest Management Planning Section
70 Foster Drive, Suite 400
Sault Ste. Marie Ontario P6A 6V5

Dear Brian:

Re. Northwatch Comments on Proposed Revisions to the Forest Management Planning Manual, EBR Registry Number 010-5349

As you know, Northwatch has had a lengthy involvement in forest management planning in Ontario, both from policy and practical perspectives. We were party to the Class Environmental Assessment on Timber Management on Crown Lands in Ontario in the late 1980's and early 1990's, participated extensively in the Forest Management Planning Improvement Project which concluded in 2004, and have been involved in many other policy and regulatory exercises. We have also been regular participants in forest management planning processes, and have done a great deal of work supporting public participation in the forest management planning process through Northwatch's Forest Project, which works with Local Citizens Committees and other forest management planning participants to increase the level and effectiveness of public participation in forest management planning.

Despite that experience and our familiarity with forest management planning, how it is structured, and how planning steps relate to plan outcomes, we have felt challenged by the current task of reviewing and responding to the proposed revisions to the forest management planning manual within the time provided. By our count there are 146 sets of proposed changes and hundreds of proposed changes in total. Some of the proposed changes are extremely significant, and many are hard to assess in terms of their significance, as they are tied to proposed changes in other documents, such as the Forest Information Manual, or new guides which have not been finalized but which are reported to have gone through considerable changes since they were released in draft for public comment.

We appreciate the time and effort you and your colleagues have spent in providing Northwatch and others with an outline of the proposed changes, and sharing that information through a web-based presentation. We have found this helpful, although we must note that not all of the proposed changes were identified in the presentation or the powerpoint slides and notes.



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As part of our review effort, we worked with a number of other environmental organizations to produce statements summarizing our common concerns in the three key areas of forest sustainability, climate change and expanded biofibre production. Northwatch has endorsed these statements and they have been provided under separate cover.

In addition to those collaborative pieces, we are providing our own comments on the proposed changes. As noted, the volume of material and the necessary attention to detail combined with the short time frame has been challenging. The net result is that our comments are, at time of submission, incomplete. There are several areas of proposed revision which we will not be addressing in this submission, but for which we have concerns. We hope that there may be an opportunity to provide additional comment in the near future.

Our comments are divided into four sections:

- Areas where improvements are needed, but do not appear to be caught by the proposed revisions
- Comments on key areas of proposed revisions
- Comments provided in table form on Stages One and Two of Phase I of the planning process, corresponding to the proposed revisions; and
- Additional comments

Areas for Improvement Not Addressed

There are numerous areas where the 2004 Forest Management Planning Manual lacked clarity, direction, or sufficient detail. In this section of our comments we would like to briefly outline some of the key areas that we had hoped the proposed revisions would address, and would recommend being incorporated into FMPM 2009 following this review process.

Purpose of a Forest Management Plan

The 2004 Forest Management Planning Manual did not include a statement of purpose, either of forest management planning or of forest management plans. In our view, this has created some lack of clarity in the planning process, and is a deficiency which can easily be addressed.

The 1996 Forest Management Planning Manual contained the following statement:

The primary goal in every forest management plan is to achieve a healthy, sustainable forest ecosystem, which is vital to the well-being of forest based, as well as non-forest based, Ontario communities.®

We note that the 2009 FMPM (draft) includes statements which could easily be adapted to a statement of purpose, such as:

“The forest management plan must provide for the sustainability of the Crown Forest on the management unit” (A-31)

and

“The conclusion is a determination that the forest management plan provides for the long-term Crown forest health on the management unit, and has regard for plant life, animal life, water, social, air and social and economic values, including recreational values and heritage values.” (A-32)

The statements already included in the 2009 FMPPM (draft) could be readily blended to provide a purpose statement which is consistent with the Crown Forest Sustainability Act and provides clear direction to forest management planning participants, including the Plan Author and planning team. We recommend a statement such as the following be included in the final draft:

“The primary goal of a forest management plan is to provide for the sustainability of the and long term health of the Crown Forest, and to have regard for plant life, animal life, water, social, air and social and economic values, including recreational values and heritage values.”

Determination of Sustainability

As outlined in greater detail in the ENGO statement on sustainability, forwarded under separate cover, the determination of sustainability has been rendered a rather meaningless exercise because of its circulate nature. The determination of sustainability, in the context of the forest management planning process, almost entirely on the achievement of the objectives, with the targets – which have been set by the planning team – being the means of evaluation. If the targets are valid, we may have a valid evaluation and a reliable determination of sustainability. If the targets are not valid, however, we have only a shell game.

The determination of sustainability, under the 2004 manual and the proposed 2009 manual – rests almost entirely on the Assessment of Objective Achievement. While we have not been close enough to most planning process to say with certainty in each case, we have a sense that the assessment of objective achievement has particular results because of the sequencing - or mis-sequencing - of the planning steps. If the modeling done for the proposed management strategy is used as the basis for identifying the desired levels and targets for the objectives, or for amending them it can be expected that the objectives will be achieved, given that the proposed management strategy was used to determine those same desired levels and targets. If this is the case - and it often appears to be - then it renders the planning process as hollow and meaningless, and simply window dressing for a set of questionable computer projections.

Transparency and Public Participation in Stage Two

One of our key concerns under the current manual has been the lack of transparency in Stage Two of the first phase of forest management planning. During this stage, the Long Term Management Directions are developed, which then serve as the foundation for all future planning decisions.

In effect, Stage Two is the most important stage in the forest management plan's development, but the first information centre is not held until Stage Three. The public is invited to provide comments in Stage One and express their views on the desired future forest and its benefits, and in Stage Two the description of the desired future forest and its benefits are to be one of the key inputs into the development of the plan's objectives, but the manual provides no clear direction on how the 'public input' that is to be incorporated is to be acquired, or how public input received in response to the Invitation to Participate is carried into the development of the description of the desired future forest. While the Desired Forest and Benefits meeting is not closed to the public, nor is it explicitly stated that it should be open to the public; districts have taken various approaches to this, with some holding open meetings, some including selected individuals who are not on the LCC or planning team by invitation only, and some limiting the meetings to only LCC and planning team members.

There are then several very important steps taken in the development of the Long Term Management Directions, following the development of a description of the desired forest and its benefits, but the general public has no window into this process, and even Local Citizens Committees have limited opportunities and abilities to shape the plan directions.

In addition, Plan Authors are inconsistent in what information they will make available during the 30 day review of the Long Term Management Directions summary, making that small window into the process even smaller.

Finally, the timelines for public review, and MNR provision of the preliminary list of required modifications is ridiculously short (15 days after the close of public comments), rendering the likelihood of comments from the public actually affecting the Long Term Management Direction extremely limited, even if the comments are entirely appropriate and would improve the plan direction.

None of these weaknesses are addressed or resolved by the proposed amendments, and as will be discussed later in this submission, in some instances these problems are made worse by the proposed revisions.

Improvements would include:

- A plain-language invitation to the public to contribute to the setting of management directions
- An opening up of the Desired Forest and Benefits workshop to interested members of the public

- Clearly set out opportunities for forest management planning participants to review and comment on such components of the LTMD package as the objectives and targets prior to their being embedded in the LTMD package
- A workshop-style presentation of the LTMD package at the beginning of the 30-day public review of the LTMD summary
- An expanded amount of time between the end of the public comments on the LTMD summary and the requirement for MNR to provide the plan author with the list of required modifications

Surplus Areas

The current forest management planning manual allows for the areas that are available for harvest to be moved into “surplus” should they be in excess of requirements:

“The selected harvest areas in excess of the projected industrial wood requirements and wood supply commitments for the management unit, will be clearly identified and mapped as surplus areas on the operations maps”(A-52)

However, this is a mechanism that has not been frequently used, despite several management units utilizing far less than what has been allocated for several consecutive forest management plans – a situation which could be addressed through moving areas into surplus, resulting in a more credible and reliable forest management plan.

It seems that there are two barriers to the use of this mechanism: the first is the lack of direction in the forest management planning manual in terms of when the surplus mechanism should be used and how areas would be moved back into the allocation should demand require it, and the second is a lack of clarity around what is meant by the terms “*projected industrial wood requirements*” and “*wood supply commitments*”. With respect to the second barrier, some have argued that the establishment of wood requirements and supply commitments are outside the scope of forest management planning. Others have argued that determining demand is part of the process of setting allocation and harvest levels, which are central to the forest management planning process.

The revised forest management planning manual should address these issues and provide clear direction on how and when the surplus mechanism can and should be used.

Criteria for Early Plan Renewal

Neither Part A, Section 2.0 or Part E, Section 3.0 in the 2004 FMPM (or their equivalent sections in the draft 2009 FMPM) provide criteria for determining whether the Long Term Management Direction remains valid, or whether an unscheduled plan renewal is required.

This is a key decision point, and this deficiency must be addressed in the revised forest management planning manual.

Key Areas of Concern with Proposed Revisions

In addition to those concerns expressed in the ENGO statements provided under separate cover which Northwatch endorsed, there are a number of areas where we have either very substantive concerns or thematic concerns, ie a set of concerns that recur throughout the proposed revisions. These areas include concerns with the proposed changes to Stage Two and the development of the Long Term Management Directions, concerns with reduced transparency and public access to planning related information, and concerns with “efficiency” measures which could result in poor planning and the retention of shortcomings from previous planning efforts.

Proposed Changes to Development of Long Term Management Directions in Stage Two

As noted above, we have had a number of concerns under the 2004 Manual, primarily around transparency and openness related the development of the Long Term Management Directions.

While these concerns have not been resolved or addressed by the proposed revisions, we now have additional concerns with some of the proposed changes to Stage Two in general and the process for developing the Long Term Management Direction in particular.

A number of these concerns are identified in other sections of these comments, including in the table below, but we see value in discussion them in context here, albeit in a summary fashion. In our view, given that the Long Term Management Directions serve as the foundation for all future planning decisions, this is an area that must be paid close attention.

Some of the proposed changes between the 2004 FMPM and the draft 2009 FMPM with respect to the approach for determining the Desired Forest and Benefits are effectively a down-grading of the importance of the DFB. This “downgrading” is well-represented by the moving of the discussion of the Desired Forest and Benefits out of its own subsection with its own heading and moving it into the section on developing management objectives. and moved to later in the LTMD development steps.

The development of the DFB has also been moved to slightly later in the process; this is a small but significant shift, and one which we do not support. In FMPM 2004 the DFB meeting was held and description developed prior to the development of the management objectives; it was a key input into the development of objectives, and was foundational. In FMPM 2009 the DFB meeting is held during the development of the management objectives, rather than at the start of the development process. There is also less direction

for the DFB meeting and current shortcomings related to the development of the DFB have not been rectified.

Another key concern is the proposal to replace references to management strategy with Long Term Management Direction. In our view, the replacing of the term management strategy with the term long term management direction to be confusing and particularly unhelpful, and cannot imagine what rationale there could be for such a substitution.

As supported by other sections of the manual both the 2004 and 2009 versions the Long Term Management Directions is more than what was called the management strategy in the 2004 manual, although the Management Strategy is a significant component, and a component which is frequently referred to, and which requires some descriptor (such as, for example, management strategy).

As described in the 2004 manual, a management strategy is represented by the types and levels of access, harvest, renewal and tending activities required to manage forest cover, to balance achievement of management objectives. The revised / replacement section, now titled Development of the Long Term Management Direction begins with a statement the decision support system will be used to conduct strategic analysis to determine the types and levels of access, harvest, renewal and tending activities required to manage forest cover, to balance achievement of management objectives. This sounds remarkably like a Management Strategy, as described in the 2004 Manual. The Long Term Management Direction, on the other hand, includes the Management Strategy, but also the objectives and the determination of sustainability. For planning purposes, the summary of the Long Term Management Direction also includes an identification of primary road corridors and preferred and optional harvest areas for each five year term. This is unchanged from the 2004 FMPM to the draft 2009 FMPM.

Finally, the amount of information to be provided as part of the LTMD summary has been significantly reduced with the removal of the table requirements. The tables provide a consistent and organized method of presenting information which are important to understanding and evaluating the proposed Long Term Management Direction.

Reduced Transparency and Access to Planning Information

A great number of the proposed revisions will, in our view, result in a decreased ability of the public to participate in forest management planning because access to information has been reduced or the transparency of the planning process has become more limited.

Examples include:

- summary maps will no longer have past and approved areas of harvest areas depicted; while this may reduce “noise” on a crowded map, it is simply substituting one problem for another, with the new problem being a reduced level of information being provided to the public; showing past and approved harvest areas on the summary map that shows planned harvest areas for the plan under development allows a member of

- the public to evaluate the cumulative impact on an area, which is essential to their understanding of what is being proposed
- removing the information requirements for LCC from Section 3.2.4 reduces the LCC members' ability to understand what information they should expect – and should be expected to be familiar with – and increases the burden on the MNR staff who provides support to the LCC; this is often a set of responsibilities which are outside the actual job description of the MNR staff assigned the support role, and should not be made more burdensome or less likely to be effective by removing the description of information requirements
 - removing the requirement to include a description of the historic forest condition because it will be provided through the landscape guide does not serve the planning process or the planning participants well; in all likelihood, this will result in less local detail, reduced ownership by both the planning team and the Local Citizens Committee, and will make the information less available to forest management planning participants
 - values maps potentially becoming less accessible or available
 - dropping the natural benchmark run from the planning process makes a comparison between the impacts of more or less intensive management more difficult
 - The removal of several of the tables, or reducing information provided on the tables, and in particular:
 - removing table FMP-11, “Projected Operations, Revenues and Expenditures”
 - removing table FMP-12, “Frequency of Forest Disturbance”
 - removing the projected column from FMP=15, “Forecast and Planned Harvest Area”
 - removing operational roads form FMP –23
 - removing the revenue portion from FMP-24, and
 - deleting the Existing Roads Table

“Efficiency” Measures

Repeatedly throughout the draft 2009 FMPM we see the phrase “review, and confirm, update or revise ...”. Couched as a measure to “recognize previous planning efforts” and no doubt deemed an efficiency measure, we have concerns with the approach. Built into the approach seems to be an assumption that the next plan will reflect the last plan, suggesting that everything is pretty much the same, and that everything should stay the same, unless actually required to be different. The questions arise: what would require it to be different? What would allow it to be considered not different?

While we appreciate that much of the planning process presently uses an approach of building on the previous plan – for example, the objectives of the last plan are a key input into the development of objectives for the next plan – and we agree that previous planning efforts and information gathering should be recognized, we are still troubled by this repeated phrase. In our view, the approach may be problematic, and may result in less rigour and in planning teams retaining more fundamental flaws than would otherwise be the case.

Responding Comments on Stages One and Two of Phase I Proposed Revisions

The following table represents our item-by-item response to the proposed revisions to Stages One and Two of Phase I of the forest management planning process. Due to limited time and capacity, we were unable to provide this detailed response for the entire suite of proposed revisions, but wish to be clear that this was due to constraints on our part, not a lack of concern or a greater degree of consent to those sections which have not been similarly addressed.

| Part A – Sections / Stages One and Two | |
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| <u>Section 1.0, Preparing the 10-year FMP</u> | |
| –Updated preparation time to 36 months | This is a reasonable change and is a more realistic time estimate than the |
| –Updated Figure A-1 to reflect 36 months | |
| –Removed Figure A-2 | <p>It appears as though it is Figure A-1 that has been removed, and Figure A-2 has been modified to remove the details for Stage 1; it appears that Figures A-3,6, 7, and 8 have been removed, as have Figures A-10 and A-11 (A-9 appears to have become A-4); while these figures as presented in FMPM 2004 were difficult to understand, particularly at first viewing, they were at least an attempt at a chronological summary of the planning process, which is helpful. In our own materials, we had moved this information from these figures into a table, with a summary of what was to be done at each stage.</p> <p>RECOMMENDATION: replace the figures referenced above with a table summarizing the stages of each of Phase I and II with a short summary , as per the bullet points in the FMPM 2004 figures; a second version of this same table should be added to Part A Section 3 to summarize public consultation opportunities</p> |
| <u>Section 1.1.2, Planning Team</u> | |
| –Removed lands administration, fire management, parks and natural heritage, and enforcement staff as members | The removal of parks and natural heritage staff from the planning team sends a negative message about MNRs commitment to integrated and balanced planning; the Planning Team is portrayed as the decision-making group, and demoting parks and natural heritage |

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| | <p>from part of that decision-making group to an advisory role is not acceptable Recommendation: retain parks and natural heritage staff on the planning team</p> |
| <p>–Added requirement for MNR District Manager to appoint a Project Manager</p> | <p>This is a reasonable change and makes the structuring of the planning team more transparent and clarifies accountability.</p> |
| <p>–Steering committee now a requirement</p> | <p>This is a reasonable change and makes the structuring of the planning team more transparent and clarifies accountability. However, the statement that “The steering committee will have the authority to resolve resourcing issues and disagreements among planning team members” is potentially problematic.</p> <p>RECOMMENDATION: FMPM 2009 should clarify the decision-making roles of the steering committee and how they relate to those of the MNR (including MNR staff, DM and RD).</p> |
| <p>Northwatch Recommended addition</p> | <p>There is a lack of clarity or transparency around the decision-making functions of the planning team, and how the decisions that are made by the planning team relate to the regulatory responsibilities of the Ministry of Natural Resources. Plan Authors and planning team members – including MNR staff – often refer to the “decisions” of the planning team, suggesting that the planning team members is the actual decision-maker. While we appreciate that there is an effort to arrive at planning decisions in a collaborative manner, some clarification is required.</p> <p>RECOMMENDATION: FMPM 2009 should clarify the decision-making roles of the Planning team and how they relate to those of the MNR (including MNR staff, DM and RD) and how they relate to the decisions that might be required of the steering committee</p> |
| <p><u>Section 1.1.2.1, Terms of Reference</u></p> | |
| <p>–Recognize previous planning effort – review, and confirm, update or revise</p> | <p>Section 1.1.2.1 is one of the first instances of an approach that is through the proposed revisions, that being an assumption that the next plan is reflects the last plan, suggesting an “everything stays the same unless required to be different”. This may be problematic, as it may result in less rigour and retaining more fundamental flaws than would otherwise be the case. This is discussed in more details in our text comments.</p> |

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| –No longer updated throughout planning process | The splitting out of the Terms of Reference from the “project plan” is reasonable. However, what is lacking in the proposed revisions – and was lacking in FMPM 2004 – is clarity around how the Terms of Reference and Project Plan are to be made accessible to forest management planning participants, including but not limited to the members of the Local Citizens Committee. |
| –Moved some requirements to project plan | |
| <u>Section 1.1.2.2, Project Plan</u> | |
| –Now a requirement | The splitting out of the Terms of Reference from the “project plan” is reasonable. However, what is lacking in the proposed revisions – and was lacking in FMPM 2004 – is clarity around how the Project Plan is to be made accessible to forest management planning participants, including but not limited to the members of the Local Citizens Committee. RECOMMENDATION: FMPM 2009 should include direction to make the Project Plan readily available to forest management planning participants. |
| –Must be updated throughout planning process | |
| <u>Section 1.1.5, Decision Support Systems</u> | |
| –Moved from section 1.2 | This section has been largely re-written with changes not identified in the MNR presentations. We note that the new section 1.1.5 has two sets of lettered bullet points, which makes referencing more difficult. Further we, question why in the second set of bullets, item (a) in the FMPM 2009 version “including forested and non-forested lands” has been removed, and the section now refers to only the forested land base instead of the entire landbase. RECOMMENDATION: prior to making this change, MNR should provide a clarification of their rationale for the change to allow informed comment; alternatively, the language of the FMPM 2004 should be retained We support the requirement that the components of the decision support system, ie the selection of models or analysis tools, must be approved by MNR. |

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| <u>Section 1.1.6, Progress Checkpoints</u> | |
| –Changed four checkpoints | <p>We generally agree with the placement of the Progress Checkpoints as revised for FMPM 2009, but – as will be discussed elsewhere – consider the replacing of the term “management strategy” with the term “long term management direction” to be confusing and unhelpful. In addition, a mechanism is needed to allow forest management planning participants – including but not limited to members of the Local Citizens Committee – an opportunity to review and provide preliminary comment on these plan components prior to each “checkpoint” being passed.</p> <p>RECOMMENDATION: retain the term “management strategy” in the development of the Long Term Management Directions</p> <p>RECOMMENDATION: provide forest management planning participants an opportunity to review and provide preliminary comment on these plan components prior to each “checkpoint”.</p> |
| <u>Section 1.1.8, Background Information</u> | |
| –Recognize previous planning effort – review, and confirm, update or revise | As expressed earlier and discussed in more detail in our text comments, we have concerns with the approach that is through the proposed revisions, that being an assumption that the next plan reflects the last plan, suggesting an “everything stays the same unless required to be different”. This may be problematic, as it may result in less rigour and retaining more fundamental flaws than would otherwise be the case. |
| <u>Section 1.1.8.1, Sources of Direction</u> | |
| –Added endangered species, species of special concern and habitat regulations under ESA, 2007 | We support this addition, but are of the view that additional direction is required, and the linkages between the guides, the ESA and the FMPM need to be more clearly stated in the FMPM 2009. |
| <u>Section 1.1.8.2, Provincial Audits and Reports</u> | |
| –Reference to availability on internet | We support the increased availability of documents on the internet, including audits and report, but note that this increased availability and access – while being of overall benefit in terms of increasing public access and planning transparency – cannot be used as a |

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| | substitute for the documents being made available in hard copy and through District offices. |
| <u>Section 1.1.8.3, Forest Management Guides</u> | |
| –Reference to internet site where guides can be accessed | As per above, we support this increased availability and access through the internet but note that it cannot become as a substitute for the documents being made available in hard copy and through District offices. This is particularly important for older and more rural and northern members of the public and forest management planning participants. |
| <u>Section 1.1.8.5, Planning Inventory</u> | |
| –FMP-1 and FMP-2 no longer part of Planning Inventory check point | We have some concerns about the FMPM revisions being dependent on the Forest Information Manual (FIM) while the FIM is also under revision, on a similar but slightly later timeline. We also see no logic or rationale for the elimination of FMP-1 and FMP-2 from this stage of planning. The tables are useful summaries and make the planning process and its information base more accessible for forest management planning participants. We will comment in more detail on the reduction in the FMP tables elsewhere in this submission. |
| <u>Section 1.1.8.7, Inventories and Information for Species at Risk</u> | |
| –New, specific to species at risk | We support this addition to the FMPM, but suggest that the linkages between Sections 1.1.8.5 through 1.1.8.10 could be improved. The section would also benefit from some description of NRVIS and its relationship to the various inventories discussed in these sections. |
| <u>Section 1.1.8.9, Values Maps</u> | |
| –Removed text stating values maps available for public distribution upon request | We accept that the statement in FMPM 2004 that the values maps are available for public distribution may be problematic in terms of expectations that costly reproductions would always be provided, but the revised section is too limited. A literal interpretation could be taken to mean that the values maps are only available for viewing at the time of the first public notice; we expect the intent was to convey that they would be available for viewing from the time of the first public notice, ie at all times after the first public notice. The section should also include a statement that the value maps can be purchased, or may be made available on a limited basis, or something to that effect. |

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| <u>Section 1.1.8.10, Roads Inventory</u> | |
| –Information Product | As expressed earlier and discussed in more detail in our text comments, we have concerns with the approach that is through the proposed revisions, that being an assumption that the next plan reflects the last plan, suggesting an “everything stays the same unless required to be different”. This may be problematic, as it may result in less rigour and retaining more fundamental flaws than would otherwise be the case. |
| –Portray as per FIM, 2009 | |
| <u>Section 1.1.9.1, Aboriginal Background Information Report</u> | |
| –Added to section 1.1 as part of background information. | No comment. |
| <u>Section 1.2, Preparing for Stage Two – Proposed Long Term Management Direction</u> | |
| | This section has been largely rewritten – modifications are much more extensive, in our view, than those identified in the MNR presentation on January 19 th . Please see our text comments for a discussion of the changes being proposed to Stage 2 more generally, in addition to those immediately below. |
| –Removed Figure A-3 (FMPM, 2004) | Please see comments above made with respect to removal of Figure A-2 |
| –Recognize previous planning effort – review, and confirm, update or revise | As expressed early and discussed in more detail in our text comments, we have concerns with the approach that is through the proposed revisions, that being an assumption that the next plan reflects the last plan, suggesting an “everything stays the same unless required to be different”. This may be problematic, as it may result in less rigour and retaining more fundamental flaws than would otherwise be the case. |
| –Updated Figure for LTMD Process | This figure represents some of the concerns we have with the revisions to this section. One example is the confusion introduced with the substitution of the term “long term management direction” for “management strategy”; the floating box for the Desired Forest and Benefits Meeting is not at all helpful, and fails to convey the relationship of the LCC to the development of the DFB, or the relationship of the current forest condition to the DFB; and does not even clearly convey the relationships between the base model and the |

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| | <p>analysis package. We have no suggestions for how this figure could be repaired to bring it to a useful state.</p> <p>RECOMMENDATION: Replace or delete Figure A-2</p> |
| <p>–Removed requirement for Natural Benchmark</p> | <p>The removal of the natural benchmark and null run is a significant revision to the forest management planning process, and is not one we accept. While it is flawed because it is basing the future projected forest on the current forest instead of the pre-industrial forest or estimates of what the current forest would have been in the absence of industrial forestry, it still provides a very important and useful benchmarking by which to evaluate projected changes to the forest condition in response to proposed forest management activities over time. Please see our text comments and the ENGO statement on forest sustainability for a further elaboration of this point.</p> <p>RECOMMENDATIONS: reinstate the requirement for the natural benchmark run.</p> |
| <p>–Replaced references to “management strategy” with “Long Term Management Direction”</p> | <p>As stated earlier, we consider the replacing of the term “management strategy” with the term “long term management direction” to be confusing and particularly unhelpful, and cannot imagine what rationale there could be for such a substitution. As supported by other sections of the manual – both the 2004 and 2009 versions – the Long Term Management Directions is more than what was called the “management strategy” in the 2004 manual, although the Management Strategy is a significant component, and a component which is frequently referred to, and which requires some descriptor (such as, for example, “management strategy”. As defined in the 2004 manual, “a management strategy is represented by the types and levels of access, harvest, renewal and tending activities required to manage forest cover, to balance achievement of management objectives”. The revised / replacement section, now titled “Development of the Long Term Management Direction” begins with a statement “the decision support system will be used to conduct strategic analysis to determine the types and levels of of access, harvest, renewal and tending activities required to manage forest cover, to balance achievement of management objectives”. This sounds remarkably like a Management Strategy, as described in the 2004 Manual. The Long Term Management Direction, on the other hand, includes the Management Strategy, but also the objectives and the</p> |

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| | <p>determination of sustainability. For planning purposes, the summary of the Long Term Management Direction also includes an identification of primary road corridors and preferred and optional harvest areas for each five year term. This is unchanged from the 2004 FMPM to the draft 2009 FMPM.</p> <p>RECOMMENDATION: retain the term “Management Strategy” in the discussion and development of the Long Term Management Direction, using the definitions in FMPM 2004 Section 1.2.6.2</p> |
| <u>Section 1.2.2.3, Forest Landscape Biodiversity Classifications</u> | |
| –Replace Habitat Classifications | As stated previously, we are of the view that the linkages between the guides and the FMPM need to be more clearly stated in the FMPM 2009. |
| –Facilitate use of the Landscape Guide | |
| <u>Section 1.2.3, Management Considerations</u> | |
| –Added climate change | The draft contains FMPM 2009 includes only one reference to climate change, and that reference is to simply list it as one of eight management considerations. As discussed in more details in the text of our submission, and as outlined in the ENGO statement on climate change and forest management planning revisions to which Northwatch is signator, much more is required. Climate change has been identified as a key concern during the development of forest management plans in recent years. In some Desired Forest and Benefits meetings climate change and global warming have been among the most frequently identified concerns. Comments have often focussed on helping to “prepare” the forest for the effects of climate change, and considering the likely implications of climate change in forecasting the future forest condition. Forest management planning participants also identified reducing carbon releases as an important aspect of forest management. However, the experience of at least some planning teams has been that the Ministry of Natural Resources is not able to provide either policy or science guidance in the development of objectives or setting management directions, or other aspects of forest management planning. Further, in a May 2008 workshop on possible revisions to the Forest Management Planning Manual, public interest group participants identified numerous options for FMPM revisions to address climate change. |

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| | <p>Simply adding climate change as a “management consideration”, as is being proposed in the current set of revisions to the forest management planning manual, cannot be relied upon – or expected – to be effective. While not necessarily inappropriate, it is simply inadequate. .</p> <p>RECOMMENDATION: What is required is clear direction to make climate change strategies, for both adaptation and mitigation, key drivers in the forest management plan. These climate change strategies must be linked to each key area of the forest management plan – including plan objectives, Areas of Concern planning, spatial distribution of harvest blocks, silvicultural systems employed – and must be developed and evaluated at both the management unit and landscape level</p> |
| <u>Section 1.2.4, Base Model</u> | |
| –Recognize previous planning effort – review, and confirm, update or revise | As expressed early and discussed in more detail in our text comments, we have concerns with the approach that is through the proposed revisions, that being an assumption that the next plan reflects the last plan, suggesting an “everything stays the same unless required to be different”. This may be problematic, as it may result in less rigour and retaining more fundamental flaws than would otherwise be the case. |
| <u>Section 1.2.4.1, Forest Dynamics - Growth and Yield</u> | |
| –Added requirement to provide separate estimates for yield (biofibre) | As discussed in the joint ENGO statement on biofibre and the FMPM proposed revisions, we have concerns about how FMPM 2009 may facilitate biofibre harvest and that it promotes biofibre harvest in a policy context that is not sufficiently developed to control the significant risks. Further, biofibre is not defined, which adds weight to the concern that its inclusion in the FMPM 2009 could result in additional confusing and unintended ecological impacts. RECOMMENDATION: remove references to biofibre in the FMPM 2009 |
| <u>Section 1.2.2.4, Strategic Silvicultural Options</u> | |
| –Removed similar silviculture expenditures as a criteria for grouping SGRs | No comment. |

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| –Strategic silvicultural options in base model must be consistent with most common SGR | No comment. |
| <u>Section 1.2.4.5, Management Zones</u> | |
| –Provide spatial context | We support this section being added to the Forest Management Planning Manual, and think that it is particularly important in light of consolidated forest management units that cover large areas and include different landscapes. RECOMMENDATION: include additional direction to planning teams on whether and when to partition the management unit, and include a requirement that the plan text discuss why the planning team did or did not choose to partition the management unit. |
| –Strategic and Operational | |
| –Must provide a description in text | |
| <u>Section 1.2.6, Developing management Objectives</u> | |
| –Incorporated desired forest and benefits meeting | As discussed in more details in our text comments about Stage Two, we do not support the changes made with respect to the approach for determining the Desired Forest and Benefits. The changes between the 2004 FMPM and the draft 2009 FMPM are effectively a down-grading of the importance of the DFB – well-represented by moving the discussion out of its own subsection with its own heading and moving it into the section on developing management objectives. and moved to later in the LTMD development steps The development of the DFB has also been moved to slightly later in the process; this is a small but significant shift, and one which we do not support. In FMPM 2004 the DFB meeting was held and description developed prior to the development of the management objectives; it was a key input into the development of objectives, and was foundational. In FMPM 2009 the DFB meeting is held during the development of the management objectives, rather than at the start of the development process. Thirdly, there is less direction for the DFB meeting. Finally, as discussed in the text of our comments, current shortcomings related to the development of the DFB have not been rectified. RECOMMENDATION: drop amendments as proposed in current draft; make changes as per Northwatch’s text comments. |
| <u>Targets</u> | |
| –Established for first ten-year period of the FMP at a minimum | We accept that a first-ten-year target may be acceptable for some objectives, but for others it will not be appropriate. |

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| | RECOMMENDATION: provide additional text describing under which conditions a ten-year target would be acceptable, and for which objectives the target would be for a longer time frame |
| –Consider past plans and historical objective achievement | We support this addition. We would note, however, that Section 1.2.6 has four sets of lettered bullets, which could be confusing and make it more difficult to reference the direction provided in the bullets. |
| <u>Figure A-3, Indicators of Objective Achievement (Figure A-5 FMPM, 2004)</u> | |
| –Separated indicators assessed during plan preparation and implementation | We support this amendment, although a third category seems necessary, ie those indicators which can only be assessed over a longer time frame, ie over a series of plan terms. |
| –Removed criterion column | We accept this amendment; by our observation, the criterion column was only helpful to those who are familiar with the broader discussion of Criteria and Indicators, and in many cases caused confusion for forest management planning participants. |
| –Facilitate implementation of Landscape Guide and Stand and Site Guide | As stated previously, we are of the view that the linkages between the guides and the FMPM need to be more clearly stated in the FMPM 2009. |
| –Modified compliance indicators | <p>We have some concerns about the proposed revisions to the compliance indicators as depicted in Figure A-3. Some of our concerns are related to our more general concern, as described immediately above, with the linkages between the manual and the guides. For example, we note that landscape patterns, area by forest type, and amount and distribution of old growth forest have all been removed, and we understand that these are all to be addressed to some degree by direction provided in the new guides. This does not, however, relieve or reduce the need to have them included in the objectives suite. We also note that the indicators for compliance with prescriptions for the protection of natural resource features, land uses or values dependent on forest cover and for compliance with prescriptions for the protection of resource-based tourism values have been removed. We do not agree with these indicators being removed.</p> <p>RECOMMENDATION: included the forest diversity and compliance indicators referred to in the preceding comment.</p> |

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| <u>Section 1.2.7.2, Spatial Assessment</u> | |
| –Added management zones to the considerations for preferred harvest areas | We support this addition. |
| –Added direction for selecting preferred harvest areas regarding spatial and non-spatial models | We support this addition. |
| <u>Section 1.2.7.3, Social and Economic Assessment</u> | |
| –Removed requirement to use a social and economic model | We support the removal of the requirement to use SEIM or another social or economic model, given that the available models have not been particularly useful to date. However, in the absence of an appropriate model, additional direction should be provided in the interests of consistency and thoroughness. RECOMMENDATION: FMPM 2009 should provide additional direction on social and economic assessment. |
| <u>Section 1.2.10, LTMD Summary</u> | |
| –Removed FMP table requirements | We disagree with removing the table requirements. The tables provide a consistent and organized method of presenting information which are important to understanding and evaluating the proposed Long Term Management Direction. RECOMMENDATION: retain the table requirements |
| – | It would be appropriate to also make the LTMD summary available on the internet, given the foundational nature of the LTMD and the importance of this public comment opportunity. RECOMMENDATION: make the LTMD summary and key supporting documents available on-line |
| – | Given the great variability and the sometimes poor quality of the LTMD summaries produced over the last three years, additional direction on the preparation and contents of the LTMD summary would be appropriate. RECOMMENDATION: provide additional direction on the preparation of the LTMD summary. |

Additional Comments

The following comments primarily follow from our discussions at the time of the webex presentation on January 19th, and are provided here to ensure that they are captured as part of this review process:

- there is a need to address what is often a time gap between development of the Long Term Management Direction and the release of the most current Independent Forest Audit report; Section 1.1.8.21 (f) cites the IFA reports and action plans as a source of direction and guidance for decision making that are to be available to the planning team and the LCC at the outset of planning, but there have been numerous instances when planning commences after the most recent IFA audit but prior to the release of the Audit Report and Action plan, and the LTMD is then developed without the benefit of the IFA audit findings; this “gap” must be addressed at a corporate level in MNR
- While the 80/20 or 90/10 rules for clearcuts were virtually meaningless because they placed a limit on frequency but not on total area of clearcutting, it is still problematic that even this flawed limit has been removed; there continues to be a high level of public concern with both the frequency and total area of clearcut – more generally, with the predominance of this system – and those concerns will only increase with the deletion of this last remaining rule to limit clearcutting
- The lack of a definition of biofibre is a concern; there being a definition in the Biofibre policy does not reduce or relieve the need for a definition in the FMPM: we appreciate the commitment you made during the January 19th presentation to include a definition of biofibre in the next draft of the FMPM
- Part C, Section 3.3 on Plan Extension does not include a subsection on public consultation included; we appreciate the commitment you made during the January 19th presentation to draft and circulate a subsection on public consultation on plan extension in advance of completing the next draft
- While we appreciate the explanation offered during the January 19th presentation that a plan extension is only applicable to those plans approved under the 1996 manual and agree that this is generally stated in subsection 3.1, in our view it should be more clearly stated; for example, it would be clearer to state it in terms of the year of plan approval, ie. Plan extensions are only available for plans approved in 2006 or earlier
- Plan Authors do not consistently make the analysis package available to forest management planning participants who request it; in at least one instance, a plan author has refused request to make the analysis package available until after the Long Term Management Direction has been endorsed by the Regional Director, which meant that it was not available as supporting information during the public review period for the LTMD summary; we appreciate your commitment during the January

19th presentation to include a clarification that the analysis package should be available during the LTMD review

Conclusion

We appreciate the opportunity to comment on the proposed revisions, and wish to acknowledge the tremendous workload that has come with this exercise. As noted above, some commitments have been made to circulate drafts of particular sections prior to finalizing the revisions to the forest management planning manual.

Given the tremendous importance of the Forest Management Planning Manual, the volume of proposed revisions, and the likelihood that there will be a large number of further amendments following the close of the public comment period, we would like to make one final recommendation: that a second draft of the propose revisions be circulated for public comment. Given that the first forest management plan to be developed under the 2009 FMPM is not schedule for approval until 2012, we believe there is sufficient time to allow additional review and input.

Thank you again for your consideration. We look forward to reviewing future documents, and to our continued opportunities to contribute.

Sincerely,

A handwritten signature in grey ink, appearing to read 'Brennain Lloyd', is positioned to the left of a vertical line.

Brennain Lloyd
Northwatch

cc. Gord Miller, Environmental Commissioner of Ontario