
To: ecologicalforestry@novascotia.ca

Re. EAC Review of High Production Forestry Phase 1 Discussion Paper

Introduction

In general, the Ecology Action Centre (EAC) is not in favour of applying an industrial agro-forestry, high-rotation crop model to forest management. In particular, we object to the use of chemical herbicides and fertilizers. It is our belief that working with the natural Acadian forest and focusing on restoring, as much as possible, a biologically rich, diverse and healthy forest ecosystem is also the best route to creating higher yields of high-value forest products. Given the high costs of the proposed treatment schedule, our nutrient poor soils and Nova Scotia's history with under performing plantations, we also have our doubts about the efficacy of this industrial tree-gardening model.

Having said that, we are also forced to recognize that so-called High Production Forestry (HPF) was recommended by the Lahey Forestry Report as part of implementing the Triad system. And since we are generally in support of the Lahey Report and wish to see it fully implemented (i.e. the rest of it – and soon) we are similarly forced to accept some level of HPF on Crown Lands.

We are concerned that this exercise is being done in advance and in absence of a full and proper Crown land planning process that considers all forest values, a leading theme of the Lahey Report. We are concerned that it is being done in advance and in absence of important legislative changes to reflect this approach, specifically recommended in the Lahey Report as a foundational element of implementation. We are also concerned that it is being done in advance and in absence of a new planning process for Western Crown Lands, also specifically recommended in the Lahey Report. We believe the current urgency by DLF to lock-down HPF areas on a very large amount of Crown land is premature and, in combination with designating all remaining non-protected Crown lands as "Matrix", amounts to a de-facto Crown land planning process where the primary, if not sole focus is still on timber production.

The trade-off for accepting HPF is ecological forestry on the matrix lands. However, given the concerns related to DLF during Phase Two of the Forest Management Guide (FMG) revision for the Matrix lands, conservation gains related to implementing ecological forestry seem minimized by DLF's unstated but apparent overriding goal of minimizing wood supply impacts from truly advancing this model on Crown lands. The willingness for EAC, the broader environmental community and the general public to accept the Triad approach and HPF in particular, is dependent upon DLF advancing a robust approach for ecological management of the Matrix lands that achieves meaningful conservation objectives and restores the Acadian Forest ecosystem. This is the foremost challenge of advancing the Triad, and the current state of the FMG, the concurrent focus on quickly locking down a high percentage of Crown land for HPF and the lack of landscape level planning and legislative reform referenced above does not give confidence that DLF is getting Lahey implementation right, even at these early stages.

The proposed HPF area for Crown land is too large and should be substantially reduced in order to be in line with the direction provided in the Lahey Report. When areas that are not available for forestry are removed from consideration (protected areas, non-forested sites, other constraints, etc.), HPF is being proposed for almost half of the remaining forested Crown lands. And the sites being proposed consist of the best productivity sites available. This is a huge over-reach. The Lahey Report directs DLF to “give priority to protecting and enhancing ecosystems and biodiversity” as the overriding management objective. Having HPF consume half of the available working Crown forest does not come close to satisfying this objective and will not be accepted as such by the conservation community or broader public. Consider also that significant areas of private will continue to be managed under a HPF approach, begging the question: how much of the total provincial forested land base will be in plantations and what is an acceptable cap? To be clear: DLF needs to significantly reduce the amount of HPF for Crown lands to be in line with the spirit and intent of the Lahey Report.

Some additional concerns at this stage of HPF implementation are as follows.

1. Do the practices described for HPF encompass a reasonable suite of treatments required to achieve HPF yields?

As mentioned above, EAC objects to the use of chemical herbicides and fertilizers. Given the relatively poor performance of plantation forestry in Nova Scotia after over 30 years of provincial forest policy focused almost exclusively on intensive management, it remains questionable that increased yields are even possible over the long term given our nutrient poor soils and the further degradation seen from over harvesting and acid rain. DLFs proposed solution of addressing nutrient declines through application of fertilizers should be independently verified before being applied at scale and at significant taxpayer expense.

2. Related to the Triad Landbase grouping (Table 1 & Table 2), are there any areas that you think are incorrectly categorized? For example, including tolerant hardwood sites in the ecological matrix instead of eligible for HPF.

Most matrix lands identified in Table 2 (27.9% of 47.2% Total Landbase) consist of areas that are not suitable or not available for forest management. This skews the relative area available for ecological forestry and the result is that far too much of the available forested area is being proposed for HPF. HPF cannot and should not consume most of the productive sites available for forestry if DLF wants to attain the conservation benefits of implementing ecological forestry on the matrix lands. Considering the past and future trajectory of private land, drops in timber demand due to the closure of Northern Pulp and the degraded state of Nova Scotia’s forest, Crown land should have a much more modest level of HPF.

The 75% threshold for Rare/High Landuse Ecosystems is too high. Given the degraded state of Nova Scotia’s forests, the lack of mature forest cover at a landscape scale, and the expectation that clearcutting will remain as the dominant harvesting practice on private land into the foreseeable future, DLF should adopt a much more precautionary approach when considering thresholds for “highly disturbed” ecosites.

If more than 40% of an ecosection is impacted by past management than the ecosection should not be available for HPF.

3. Do the Selection Criteria (Site Productivity, Past Management, and Distance to Mill) adequately represent sites suitable for HPF? Do you have any concerns regarding how we applied the Selection Criteria? What, if any, other Selection Criteria would you like to see included?

Additional criteria should be added to ensure that tourism and recreational values are not adversely impacted by HPF sites during the selection process. For example, any known hiking trails, portage routes and scenic lookoffs, etc. should be buffered from HPF. Also, areas with concentrations of Species-at-Risk should be removed from HPF consideration.

A primary concern here is that no more stand conversions from natural or semi-natural forests to plantations take place as part of the HPF process. This appears to be the case, as the criteria seem to indicate that stands must already have been planted to be candidates for HPF designation and that is positive. There is concern for regions where past management has heavily impacted large areas through conversion. Two criteria that address this are slated for consideration at later stages of planning (Ecological Emphasis Class and Ecosystem-Based Management Approach). EAC welcomes the opportunity to participate in those discussions. Applying these considerations is expected to substantially reduce the application of HPF to address the degraded state of the forest.

4. In Appendix A, are the yield targets reasonably achievable?

In Section 13 of the Lahey Addendum, the following passage from page 65 gives cause for extreme caution in moving forward with HPF;

“Much evidence presented to the team suggests that the predicted high timber yields from plantation forestry are not being routinely realized. To determine this convincingly, and the reasons why, would require a separate major study, and we recommend that such an analysis be done.”

Prior to moving any further forward with implementing HPF, DLF should initiate an independent investigation of this issue in an open and transparent manner. As part of this analysis DLF’s growth and yield data and models should be subject to independent peer review. Much concern has been raised over the years about DLF’s system of Permanent Sample Plots, and the growth and yield data has never been externally peer reviewed in an open and transparent way, if at all.

The short rotations proposed are also problematic with respect to overall costs and yields of higher value products. The Lahey Addendum expands on this, noting that higher yield of more valuable forest products is possible under longer rotations of 75 years versus 35 years (in the example given). Allowing longer rotations will increase per hectare yields considerably, increase piece size, reduce costs for harvesting (at final felling), produce higher value forest products relative to shorter rotations and reduce the costs of implementing HPF by reducing the number of times the most expensive stand establishment and competition control treatments are required over time. Lengthening rotations will also help reduce the impacts on soil productivity by allowing more time for soils to recover from clearcutting at the onset of plantation establishment.

5. In Appendix A, do the suggested silviculture interventions and timing encompass the full suite of treatments required to achieve these yields?

See above. Longer rotations are required.

6. What other concerns do you have moving forward into the implementation phase of HPF?

The proposed HPF approach is going to cost a lot of money per hectare to implement. Given the costs, the state of current markets, stagnant stumpage prices for over 25 years and the uncertainty regarding whether the increased yields are attainable given Nova Scotia's poor performance in implementing intensive forest management thus far, DLF must provide greater certainty that the investments will represent a wise use of public funds. In addition to investigating the reasons for poor plantation performance, a net present value assessment of the costs of implementing HPF is required before moving forward to Phase Two of this initiative.

In conclusion

While we appreciate the effort that DLF is taking to engage stakeholders throughout this process, EAC remains concerned about the way and sequence DLF is implementing the recommendations of the Lahey Report. The focus thus far has been on site-level planning, first in reviewing the FMGs (which represent the most localized level of planning in the forest management framework for Crown land) and now in selecting sites for HPF. As discussed in the introduction to this submission, all of this is being done in absence of the legislative renewal, land use planning for Crown land and landscape level forest management planning that must be done in order to properly implement a triad approach for Nova Scotia. Unless and until these gaps are addressed, skepticism amongst environmental stakeholders regarding DLF's real commitment and ability to implement the Lahey Report will remain high.

Sincerely yours,



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