

February 18, 2002

Timber EA Renewal Project  
Forest Management Branch  
Ministry of Natural Resources  
70 Foster Drive, suite 400  
Sault Ste. Marie, Ontario  
P6A 6V5

Dear Madam or Sir:

**Re: Forest Management Class EA Review**

Thank you for inviting the Ontario Professional Planners Institute to provide input into the above review. We are pleased to submit the comments of our Policy Development Committee's Natural Resources Working Group on *A Paper for Public Review Concerning the Extension and Amendment of the Environmental Assessment Act Approval*, January 2002 for your consideration.

OPPI is the recognized voice of the province's planning profession, and provides leadership and vision on key policies relating to planning, development, and other important social, economic, and environmental issues. Our 2,400 practising members work for government, private industry, agencies, and academic institutions in a wide variety of fields, including public land and resource planning and environmental assessment.

Our prime interest in the Class EA Review is the maintenance and enhancement of a fair, open, and responsive forest management planning process. Would any of MNR's proposals adversely affect the process? Are there realistic opportunities for improving the process that MNR is not bringing forward?

In general, we found *A Paper for Public Review* to be a credible and well-thought-out document, and we have no objection to the proposals presented for extension and amendment of the Class EA. However, we have three areas of concern where no proposals for improvement have been advanced.

***Social and economic analysis***

We believe that MNR's performance on socioeconomic analysis, and on understanding the implications of plan alternatives on communities, remains inadequate.

The social and economic impact models that MNR cites as meeting this essential requirement of forest management and land use planning have never lived up to their promise and do not deliver effectively at the local level, which is what matters to most participants in the process.

We need only cite the Ministry's own *The Evolution of Ontario's Living Legacy* (2001), which generally takes a very positive view of the Lands for Life process. These comments, though made about the land use planning options developed by the regional Round Tables, apply equally to forest management planning:

"The other area of analysis that brought forth a great deal of criticism was the approach to dealing with social and economic impacts. The forest industry, many communities in the planning area, and quite a few of the Round Table members, were looking for an analysis that could be community-specific. What they wanted to see was a clear and direct link between the land use decisions and jobs - e.g., how many jobs might be lost in mill 'x' if 'y' hectares of land were to be taken out of forest production. The analysis that was done did not satisfy the level of specificity these people wanted." (p. 16).

Hardy Stevenson and Associates Ltd.'s *Timber Supply and Community Socio-economic Sustainability in Ontario*, prepared for MNR in 1996, provided in section 15 detailed recommendations on how community-oriented social and economic analysis could be improved. The Class EA Review should include:

- an independent assessment of to what extent these recommendations have been implemented and what else could and should be done to improve MNR performance in this important area of decision analysis,
- commitments to implement those improvements as part of the EA approval's renewal.

### ***Large landscape-oriented forest management guidelines***

We are concerned about the application of MNR's large landscape-oriented forest management guidelines, specifically the caribou and marten guidelines and the new *Guide for Natural Disturbance Pattern Emulation*, specifically where they remove or "zone out" large areas of production forest. Essentially this results in *de facto* land use planning, and the preemption by forest management planning of what is properly land use decision-making in Ontario's Crown land and resource planning system.

This concern has been well documented in the Guidelines Review project undertaken by ArborVitae Environmental Services Ltd. Regarding the application of the caribou guidelines, the Guidelines Review team noted that:

"these habitat blocks are very large and the guide is unique among management guides in that it proposes a process of regional strategic planning to allocated these blocks. . . .

"Associated with the guide are a variety of habitat analyses and the use of a habitat mosaic. When originally conceived and developed habitat mosaics were to be a strategic planning tool that mapped capable habitats in large contiguous blocks. Through implementation this strategic planning mapping exercise has become a long-term land use designation. Under the current application approach the mosaic dictates where forest operations may be undertaken in each twenty-

year planning period for the next one hundred years. Application in the forest management planning process is to accept and extend this blocking over a time horizon well beyond the planning period. **These geographically and temporally distinct land use designations are beyond the scope of the current planning system.**" (p. 255).

The process for identifying the caribou (or marten) blocks has been controversial in the North. This issue has been raised by the public, which is understandably concerned about the lack of public involvement in identifying the blocks, as well as about impacts on wood supply, and the potential economic impacts to both the forest and tourism industries resulting from larger clearcuts.

These land allocations are occurring without being clearly acknowledged to the public, as the allocation decisions resulting from these guidelines are not presented in the land base-associated tables provided in forest management plans. The amount of forest land effectively taken out of production is far from insignificant, and amounts to considerably more than the land taken out of production for protected areas by the *Ontario's Living Legacy Land Use Strategy*.

We believe this is contrary to MNR's clearly stated and understood policy that forest land is to be removed from production only through land use planning decisions under the *Public Lands Act*, or the designation of reserves as part of forest management planning. This approach also severely limits the ability of planning teams to creatively develop options and unique solutions to issues in a particular forest.

The Class EA Review should address this issue and propose changes that will make the application of these guidelines consistent with MNR's planning system and the public's expectation of it.

### ***Commitment to the Internet as an essential part of forest management planning***

It goes without saying that there have been incredible improvements in electronic communications and people's access to them since 1994. The forest management planning process in particular has always been bedevilled by large volumes of information and the challenging geography and sparse population of much of the Area of the Undertaking - but with most Ontarians having ready access to the Internet through home, work, school, and library, it need be no longer.

The Class EA Review should propose wholesale revisions to the public consultation section of the *Forest Management Planning Manual* to reflect this reality. These should include, but not be limited to, a requirement that the process for each plan include establishment of a web site. On this site, all documentation would be posted for public review and comment, and through this site, public input would be solicited and provided. This would be in addition to the currently prescribed consultation media, and input provided through the web site would be automatically considered equivalent to any other form of

participation. All documentation posted should be downloadable. Maps would have to be posted in a format readily printable at home (i.e., 8½ in x 11 in sheets), but the plan author could still indicate that a better hard copy is available or viewable through the traditional channels.

The Class EA Review should also require that the to-be-revised *Forest Management Planning Manual*, and as soon as possible, all other manuals and guidelines, be posted on and downloadable from MNR's web site. It is not acceptable that, except for a couple of guidelines released recently, none of these documents are currently available online.

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Again, we appreciate the opportunity to participate, and we look forward to reviewing MNR's submission to the Minister of the Environment later this year. If you would like any further information or clarification regarding our comments, please contact directly Tony Usher, Natural Resources Working Group chair, at (416) 425-5964, fax (416) 425-8892.

Sincerely,

*(original signed by)*

Loretta Ryan, MCIP, RPP  
Manager  
Policy and Communications