

**SASKATCHEWAN ENVIRONMENTAL SOCIETY (SES) COMMENTS ON
NORTH CENTRAL INTEGRATED FOREST LAND USE PLAN
DRAFT #2
March 14, 2006**

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INTRODUCTION

As a provincial environmental organization, we focus our comments on ecological concerns. However, we recognize and respect that there are many other valid concerns about the plan that may be raised by local community members, traditional land users, and others who use and value the forests of northern Saskatchewan. We acknowledge that the land in the planning region is the traditional territory of the Woodland Cree and we respect their wishes to gain greater control over the land and resources in their homeland. We remain committed to land use planning that will protect the health of the forest and preserve its values for future generations.

DRAFT PLAN FAILS TO DELIVER ON ITS PROMISES TO PROTECT BIODIVERSITY AND ECOSYSTEM HEALTH

Throughout the land use planning process, SES has repeatedly stated the need for an ecosystem based land use plan that would protect the integrity of forest ecosystems and maintain biodiversity. We have asked for a land use plan that makes a long term commitment to maintaining healthy forests for future generations. We entered the land use planning process in good faith, prepared to work with others to develop a plan that would meet our common goals. We were encouraged by the widespread support within the Regional Advisory Board for an ecosystem based land use plan that would protect the health of forests for future generations. And we are pleased to see those goals stated in the draft land use plan. However, while the draft plan pays lip service to the protection of ecosystem health and biodiversity, it fails to deliver on its promises.

- √ The land use plan designates only 11 percent of the planning area as potential ecological reserves to be included in the Representative Area Network Program. The areas to be protected from industrial development should be larger – large enough to maintain viable populations of all indigenous species and large enough to withstand natural disturbances like wildfire. The formal designation of adequate protected areas should be as much a priority as the establishment of forest management agreements.
- √ The selection of the Pink Lake site seems to be largely determined by an analysis of its enduring features and its low mineral potential. Rather than designating protected areas in the “leftover” regions deemed less valuable for mineral exploitation, we should be selecting protected areas on the basis of their high conservation value.
- √ The lands adjoining the Churchill River and other important river systems in the planning area are designated as a “sensitive zone”, but this zone remains open to industrial development. The description of what land uses would be allowed within this “sensitive zone” is too vague to provide adequate guidance for future development. This can only serve to defer land use conflicts to a later point in time.
- √ The design of the potential ecological reserves leaves much to be desired. Alternative proposals that call for larger protected areas with high conservation value, joined by connecting corridors, have not been included in the draft plan. Why not? Where is the evidence to allow the public to weigh the pros and cons of different zoning options?
- √ The draft plan is based on a premature commitment to the development of an expanded forestry industry in the absence of an adequate forest inventory or an assessment of the economic and ecological viability of such expansion.
- √ The draft plan contains no calculation of the allowable timber harvest in the planning area (as required by *Forest Resource Management Regulations*).

SES PARTICIPATION IN THE LAND USE PLANNING PROCESS

After five years of trying to develop a sound land use plan, SES is disappointed in the land use planning process

The Saskatchewan Environmental Society (SES) has participated in the North Central Land Use Planning (NCLUP) process since its inception. Members of our organization attended a public meeting held in 2000, where Saskatchewan Environment staff invited citizens to become involved in the planning process. In 2001, when the NCLUP Regional Advisory Board was established, the Saskatchewan Eco Network was invited to participate. The Eco Network is made up of many environmental organizations including SES, and we agreed to participate on the Regional Advisory Board.

An SES representative regularly attended meetings of the Regional Advisory Board from June 2001 until the fall of 2004, when the Regional Advisory Board was suspended. The government's decision to suspend the meetings of the Regional Advisory Board was not the first time that SES faced barriers to participation in the land use planning process. In September 2001, a representative from Saskatchewan Energy and Mines objected to the composition of the Regional Advisory Board, particularly, the participation of environmental group representatives from outside the planning area. Local members of the Regional Advisory Board were then asked whether the Canadian Parks and Wilderness Society and SES should be allowed to participate in the Regional Advisory Board meetings. "All board members were in favour of both CPAWS and SES having representation." (RAB minutes, Sept 21, 2001) We were pleased that representatives from northern communities welcomed our input and we looked forward to an opportunity to exchange ideas and learn about the issues of concern to local people. However, in June 2002, Saskatchewan Environment announced that it would no longer cover the travel expenses for Regional Advisory Board representatives who did not live within the planning region. Since that time, SES and others have participated at our own expense. Then in the fall of 2004, Saskatchewan Environment suspended any further meetings of the Regional Advisory Board. To us it appeared that Saskatchewan Environment hoped to discourage our participation and develop a land use plan without any substantive input from provincial environmental organizations.

Since the fall of 2004, we have continued to work with other former members of the Regional Advisory Board who are committed to the development of an ecosystem-based plan designed to conserve the integrity of forest ecosystems, while supporting land use activities to meet the cultural, social, and economic needs of local communities within the region. SES has worked with community members from Grandmother's Bay, Brabant Lake, Hall Lake, Pinehouse, and La Ronge, as well as representatives of Canoe Saskatchewan and the Canadian Parks and Wilderness Society.

Our group is called Uskiy Puhco in Cree, which roughly translates as “the land first.” Uskiy Puhco has worked with Herb Hammond, a forest ecologist with the Silva Forest Foundation, to produce a detailed report on the North Central land use planning area. The report, entitled ***Towards Ecosystem-based Conservation Planning in the North Central Plan Area***, provides important information about the character and condition of the land and the ecological sensitivity of the landscape. The Uskiy Puhco report also offers an analysis of the ecological and economic challenges of engaging in forestry in the planning region. The Uskiy Puhco report includes a proposal for zoning that would establish core protected areas designed to protect biodiversity and ecosystem functioning. This report has been shared with the Lac La Ronge Indian Band, Saskatchewan Environment, and is available to the public online. SES will continue to work with Uskiy Puhco to bring forward this information for consideration in the land use planning process.

After the suspension of the Regional Advisory Board, SES participated in two additional meetings convened by Saskatchewan Environment to discuss the land use planning process. On these occasions, we called for recognition of the goals and objectives that had been agreed upon by the Regional Advisory Board. We asked for changes in the planning process to allow the former members of the Regional Advisory Board to fulfill their obligations to provide recommendations to the Minister. And we expressed our disappointment with the first draft of the land use plan which, in our view, failed to produce an ecosystem based plan. Despite our ongoing efforts to promote an ecosystem based plan designed to maintain ecosystem integrity, we are deeply disappointed in the process and in the resulting draft land use plan. The current version of the land use plan does NOT reflect the views of SES. Nor does it address the concerns raised by many of the people who participated in the planning process.

WE NEED A PLAN BASED ON GOOD INFORMATION

The background document for the land use planning process and the draft land use plan are both weak in providing evidence that could serve as a basis for sound decision-making. The draft land use plan fails to identify the sources of information or the supporting rationale for the proposed zoning and recommendations. Thus to assume that the draft plan will protect biodiversity and ecosystem integrity requires a huge leap of faith. It is not good enough to tell the people of Saskatchewan “Trust us. Everything will be looked after.” A ‘Green Strategy’ requires more than good intentions.

There are serious gaps in information about the vegetative cover and species habitat within the region.

There has been little opportunity to synthesize the information that has been presented in order to assess its implications for the land use plan.

There is important information provided by participants in the planning process that has NOT been taken into account.

We are dismayed that the map identifying areas of high conservation value produced for the Canadian Parks and Wilderness Society and the report produced for Uskiy Puhco have not been used to inform the decisions embodied in the government's draft plan.

SES and other participants in the planning process have repeatedly stated the need to base our land use planning decisions on the best available evidence, including information about:

- the character and condition of ecosystems in the region
- the ecological limits and ecological sensitivity of landscapes in the region
- the current populations and habitat requirements of focal species
- the patterns of natural disturbance
- the size and shape of protected areas needed to maintain the natural range of variation in ecosystem structures and functions
- the environmental impact of land use activities, e.g. logging, mining, road building, hunting, trapping, tourism, recreation, etc.
- variety of land uses that generate social, cultural and economic benefits
- areas most suitable for different land use activities
- areas most suitable for the conservation of natural systems and processes

We appreciate the efforts that have been made to collect information from local residents of the planning area and to include indigenous knowledge of the region in the planning process. We feel that this local and indigenous knowledge is an important source of information about the land, the people, the animals and plants of the region, as well as the practical knowledge gained from observing the long term consequences of changes to the landscape.

WHAT WE DO AND DON'T KNOW SHOULD MAKE US PROCEED WITH CAUTION.

For example, we do know:

- Forests provide important natural services necessary to sustain life. (e.g. the production of pure water, carbon storage, oxygen production, food and medicines, living space and shelter for people and animals).
- The Churchill River watershed plays a vital role in maintaining the life of the forest, its people and its wildlife.
- The region is characterized by rocky outcroppings, shallow soils, cold climate, fine-grained changes in topography, and complex, widespread water systems, all of which contribute to its ecological sensitivity.

- Protected areas need to be large enough to withstand natural disturbances.
- Protected areas need to include diverse landscapes and plant communities.
- Protected areas need to be connected by corridors that allow for the movement of animals to maintain viable populations with genetic diversity.
- Roadbuilding fragments wildlife habitat and provides pathways for the spread of invasive species.
- Clearcutting removes important structures from the forest and differs from patterns of fire disturbance in important ways.
- Fungi play a vital role in the nutrient cycle of boreal forests, and fungi populations are affected by forestry.
- There are other parts of the world that can produce wood and fibre much more quickly and cheaply than the slow-growing forests of northern Saskatchewan.
- The destruction of habitat is a leading cause of species extinction and the loss of biodiversity.
- Wild natural areas and pure water are becoming increasingly scarce.

For example, we do not know:

- detailed information on the natural patterns of vegetation in the region
- the amount of timber that can be sustainably harvested from the region
- the habitat requirements of focal species in the planning area
- the long term results of forest harvesting and regeneration practices on the boreal shield
- how northern forests will respond to the stresses from global warming
- the comparative economic and ecological costs and benefits of competing land use strategies, e.g. wilderness tourism vs. clearcutting

SES CONTINUES WORKING WITH OTHERS TO DESIGN AN ECOSYSTEM-BASED LAND USE PLAN

In December 2002, the SES representative put forth a motion which read: “The Regional Advisory Board will develop an ecosystem based, as opposed to a commercial value based, land use plan. This ecosystem based plan will seek first to preserve functioning ecosystems and second to consider ecologically responsible human uses within the NCLUP area. With this prioritization the board recognizes that healthy forest ecosystems are essential for healthy communities, cultures and economies. In the process land use planning and economic activities will be guided by the wisdom of indigenous and scientific knowledge.”

At that time, members of the Regional Advisory Board requested more information on ecosystem based land use planning before making a decision on the motion.

In March 2003, Regional Advisory Board members heard presentations on ecosystem based management by Uskiy Pimachihowin representative Jonas Bird, forest ecologist Herb Hammond and Saskatchewan Environment representative Bob Wynes. The motion was again brought to the table. All members of the Regional Advisory Board were in agreement and a decision was made to use an ecosystem based management approach to the development of the land use plan. (RAB minutes, March 8, 2003)

We strongly support the goals of maintaining biodiversity and the integrity of forest ecosystems within the planning area and we are pleased to see those goals expressed in the draft land use plan. However, the draft land use plan fails to provide an adequate foundation for achieving those goals.

In order to protect ecosystem integrity and biodiversity, the land use plan should include:

1. the establishment of well-designed core protected areas whose primary function is the conservation of healthy functioning ecosystems
2. the identification and promotion of human activities that are compatible with conservation within those core protected areas
3. the establishment of zones allocated for community expansion and economic development to meet the needs of local communities
4. the identification and promotion of sustainable land use practices that do not cause environmental degradation within the development zones.
5. provisions for the identification and protection of smaller scale areas requiring protection within the development zones.

We were told that “This board can develop zones however they wish. However, SERM would like the zones to be consistent with other land use plans.” (Regional Advisory Board minutes, June 8, 2001) Various suggestions were made for establishing zones of core protected areas and zones which allowed responsible forms of land and resource use. CPAWS submitted information on areas of high conservation value which could have been utilized to design core protected areas and connecting corridors to promote the conservation of biodiversity and fully functioning forest ecosystems. Uskiy Puhco also submitted information with an alternative zoning framework designed to preserve forest structures and functions at a large landscape level and on smaller scales within the region. Despite the time and the information that local people and former Regional Advisory Board members have contributed to the Uskiy Puhco report, it has been dismissed from serious consideration. The government’s draft land use plan fails to incorporate this information and gives us no opportunity to even consider the zoning alternatives proposed by Uskiy Puhco.

SES will continue to work with Uskiy Puhco to gather and share information in an effort to promote ecosystem-based planning in the North Central region.

THE DRAFT PLAN DOES NOT REFLECT THE VIEWS OF MANY REGIONAL ADVISORY BOARD PARTICIPANTS.

The draft land use plan claims to reflect a lengthy process of public participation. It describes the number of meetings that were held to gain public input into the planning process. But what took place at those meetings? From the beginning, we received assurances from Saskatchewan Environment staff that “the plan will reflect the recommendations of the Regional Advisory Board” and that “everyone has an opportunity to contribute to the plan.” However, we now see a land use plan written by Saskatchewan Environment staff that contains NO recommendations from the Regional Advisory Board, which has not met since September 2004. Minutes from the Regional Advisory Board reveal several occasions when the people who participated in the planning discussions reported feeling that their ideas were discounted or misrepresented:

“Concern that the meeting is completely controlled by government bureaucrats. An independent facilitator is needed to guide the meeting.” (June 8, 2001)

“Members identified the need for a chairperson, other than a SERM employee.” (Sept 22, 2001)

“Discussion shouldn’t be cut off just because it gets controversial.” (Sept 22, 2001)

“Missinipe has disbanded their LAB [Local Advisory Board] and withdrawn from the process because they didn’t want to be part of a process that might recommend expanding forestry within the region.” (April 12, 2002)

“The RAB hasn’t been given the opportunity to discuss the freeze or the boundary issue.” (April 12, 2002)

“The steering committee is being tagged with decisions they haven’t made because they haven’t had a meeting.” (April 12, 2002)

“Herb Hammond has very valuable tools and fear this board won’t be able to use them because government is stuck on their process.” (April 12, 2002)

“dissatisfaction with [Saskatchewan Environment staff] removing the medicine wheel from the group’s terms of reference” (March 8, 2003)

participants “not having their comments taken seriously on displacement of medicinal plants and their uses” (Nov 8, 2003)

“it was very negative not to acknowledge and recognize local knowledge” (Nov 8, 2003)

Problems in the process for public participation in the land use planning process came to a head when the agenda agreed upon by the Regional Advisory Board was altered by Saskatchewan Environment in such a way that it reduced the time available to hear from a resource person requested by the Regional Advisory Board. At that point, several members of the Regional Advisory Board wrote a letter to the Minister of the Environment to express our concerns.

Mediation meetings held after the suspension of the Regional Advisory Board also proved to be frustrating. We welcomed the opportunity to meet with the Chief and Council of the Lac La Ronge Indian Band, and to learn more about their plans to increase control over their traditional lands and resources. We were hopeful that the mediation would lead to a renewed effort to collaborate on the development of a land use plan that would incorporate the information provided by Uskiy Puhco. Sadly, that did not happen. In fact, the first draft of the land use plan contained incomplete and distorted representations of the Uskiy Puhco proposal for protected areas, without any of the supporting documentation. And although the government agreed that the working document of a land use plan would contain alternative scenarios with supporting evidence so that people could weigh the pros and cons of different alternatives, this process has not been followed. The draft land use plan looks very much like what Saskatchewan Environment suggested months ago. Alternatives have been largely ignored.

Despite these obstacles, we continue to hope that our ideas and our commitment to an ecosystem based land use plan will not fall on deaf ears. By working with our partners in Uskiy Puhco, we will continue to gather and share information that can be used to inform land use decisions in the future. Uskiy Puhco is having its report on ecosystem based land use planning for the region independently reviewed, and will share the results of that review with the public. It is not too late to develop a good land use plan that will more adequately protect biodiversity and ecosystem health. However, this would require a much more systematic evaluation of the information aimed at answering the questions: "What do we need to protect? What land uses fit within the ecological limits of the region?"

THE DRAFT LAND USE PLAN FAILS TO PROVIDE AN ADEQUATE NETWORK OF PROTECTED AREAS.

In order to maintain ecological integrity and biodiversity, the land use plan should establish a network of protected areas joined by connecting corridors. The draft land use plan fails to provide an adequate network of protected areas.

On September 28, 2002 and again on February 1, 2003, the Regional Advisory Board was told that the government was considering two Representative Area Network (RAN) sites at Pink Lake and along the Geikie River. These sites were selected through negotiations between Saskatchewan Environment (which identified sites based on their enduring features) and Saskatchewan Industry and Resources (which identified sites with low mineral potential). The members of the Regional Advisory Board were asked to give their approval of the proposed RAN sites. However, the members of the Regional Advisory Board raised several concerns about the adequacy of the site selection process. These included the need to take biodiversity and habitat requirements into account, the need to design protected areas large enough to withstand natural disturbances, the need for connecting corridors between RAN sites, and the need to consider other areas for protection including the Churchill River, Foster Lakes, Hickson-Mirabelli and Gow Lakes. The Regional Advisory Board was told that there were “other options for protection within land use planning.” (RAB minutes Sept 28, 2002) The Regional Advisory Board did NOT give approval for the proposed RAN sites at Pink Lake and Geikie River. (RAB minutes, February 1, 2003) Yet what do we find in the draft land use plan? RAN sites at Pink Lake and Geikie River are the only designated protected areas which are not open to potential industrial development. This is only 11 percent of the planning area.

The Uskiy Puhco report contains an alternative proposal for the designation of core reserves large enough to include diverse representation of the plant and animal communities within the planning region, and large enough to withstand natural disturbances. The Uskiy Puhco report also provides for corridors between the core reserves to allow for the movement of species. In an early draft of the land use plan, Saskatchewan Environment dismissed the Uskiy Puhco proposal for protected areas as “unbalanced” without providing any substantive arguments to challenge the information and analysis which led to the selection and design of the core reserves. In June 2005, we requested and expected the government to provide a working document that would present alternative scenarios for zoning of protected areas with supporting information and rationale, so that we could evaluate the options and work on designing appropriate zoning for the North Central region. This was not done. If the government has good information, beyond the analysis of enduring features and mineral potential, to support its zoning recommendations, where is it? If the government has information to challenge the validity of the Uskiy Puhco proposal, where is that?

MANAGEMENT GUIDELINES NO SUBSTITUTE FOR A GOOD PLAN

It is not prudent to rely on existing standards and guidelines to ensure sustainable land use practices while opening up most of the planning area to industrial development. While environmental impact assessments and forest management plans can help to identify and mitigate environmental damage caused by development activities, our knowledge of sustainable land use practices is limited. While we continue to use land and resources and learn from our mistakes through adaptive management in designated development zones, we need to set aside large areas that prohibit industrial developments. This does not mean areas with no human activities. People will continue to be able to use these areas for a variety of uses that do not cause environmental damage, e.g. hunting, fishing, trapping, and recreation.

The testimony of several members of the Regional Advisory Board points to numerous instances where existing land use practices are having detrimental impacts on the environment and on traditional land users.

- Clearcutting and other activities that have a negative impact on traplines.
- Fragmentation and degradation of habitat for woodland caribou, furbearing animals, and other forest species
- Damage from logging in riparian areas
- Removal of older trees
- Soil erosion
- Depletion of fish populations
- Overuse of camping sites along the Churchill River

Given our limited knowledge of sustainable land use practices and the limited capacity to enforce standards of sustainable practices, it seems unwise to rely on those standards to protect almost 90 percent of the planning area.

EXPANSION OF FORESTRY INDUSTRY IN THE PLANNING AREA

Saskatchewan's *Forest Resource Management Regulations* state that "every integrated forest land use plan must include the allowable harvest of timber within the planning area." Yet the draft land use plan provides no such information. The government's draft land use plan promotes the development of a Forest Management Agreement with the Lac La Ronge Indian Band, but it tells us nothing about the forestry potential of the region, deferring those questions to a later stage of planning. This is like putting the cart before the horse – making a commitment to a forest management agreement without knowing the forest inventory or level of harvesting which is sustainable.

Recent developments in the forest industry in Saskatchewan should make the government and the Lac La Ronge Indian Band cautious about relying upon forestry developments as a path to sustainable development. What is needed are long-range, sustainable strategies for community economic development that

will provide for the needs of present and future generations. Wilderness tourism, non-timber forest products, education, health and human services are all areas with significant potential for local employment. Providing support for alternative sustainable community economic development could potentially reap more long term benefits than providing support for industrial forestry, which entails significant costs in terms of road building, fire suppression, etc.

The draft land use plan is written to pave the way for the establishment of a Forest Management Agreement with the Lac La Ronge Indian Band. While we support the Lac La Ronge Indian Band's aims to gain greater control over the land and resources in their traditional territory, we remain concerned about the environmental consequences of expanding industrial forestry in the region. We are not opposed to sustainable logging that can provide employment for local people. However, we are not convinced that expanding industrial forestry makes either economic or environmental sense.

When the planning process was begun, we knew that the provincial government was committed to expanding the forest industry in Saskatchewan, but we were assured that any commitments to proceed with further allocations for timber harvesting in the North Central region would wait upon the results of the land use planning process.

On June 8, 2001, Saskatchewan Environment staff reported that "no decision has been made for forest harvesting north of the Churchill River or the Nemeiben Block. The decision was to wait for the land use plan to establish what is appropriate for those areas (no forestry, alternative forestry techniques). No term supply licenses have been issued for the Nemeiben Block. The Zelensky/Kitsaki partnership has indicated that if forestry is permitted, they would be interested in seeking an FMA for those areas. (North of Churchill and Nemeiben Block)." (RAB minutes, June 8, 2001)

Based on this information, members of the Regional Advisory Board proceeded, in good faith, to try to assess whether an expanded forestry industry, and if so, what type of forestry, would be consistent with our primary goals of maintaining the integrity of forest ecosystems and promoting responsible uses of the land.

We sought the advice of an independent forester and forest ecologist, Herb Hammond, of the Silva Forest Foundation. After analyzing maps of the available forest cover data and analyzing the forest conditions and the timber supply along several transects within the planning region, Hammond produced a report on the potential for community forestry within the planning region. His research and analysis are contained in the Uskiy Puhco report. His findings raise serious questions about the ecological and economic viability of timber harvesting in most of the planning region.

CONCLUSION

SES cannot support the current draft of the land use plan. We appreciate the time and commitment of many people, government staff and community representatives, who worked to try to influence this plan. However, we do not feel that the current draft plan reflects the vision of many of the participants who wanted to see a plan that would adequately protect the health of the forest. We encourage Saskatchewan Environment to review the information submitted in the Uskiy Puhco report and make substantive revisions before submitting a draft plan to the Minister for approval.