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October 18, 2006

Mr. James O'Mara, Director
Environmental Assessment and Approvals Branch
Ministry of the Environment
2 St. Clair Avenue West
Toronto, ON
M4V 1L5

Dear Mr. O'Mara:

Thank you for your letter dated April 6th, 2006 regarding Air Ivanhoe's request for an individual environmental assessment of the Superior-Martel Forest 2006-2026 Forest Management Plan (FMP). I would like to respond to Air Ivanhoe's request through this letter and enclosure.

Among other things, the request identifies concerns with the method and timing of forestry operations in the vicinity of remote tourism water bodies and bear management areas operated by Air Ivanhoe. Specifically;

- use of herbicides within the vicinity of specified tourism lakes, feeder streams flowing into specified tourism lakes/streams, and bear management areas;
- site preparation in the vicinity of specified tourism lakes;
- harvesting within the vicinity of specified tourism lakes.

While specific details of the request are addressed in detail in the attached package, I should note that it is MNR's position that the requirements of the forest management planning manual (1996, and phase in provisions of the 2004 FMPM), which was developed and approved in accordance with the Class Environmental Assessment for Timber on Crown Lands in Ontario, have been met and that the FMP meets the

sustainability requirements of the Forest Management Planning Manual. Therefore, the MNR believes that the request should be denied.

A few other items to note include:

- The current herbicide buffer guidelines and associated restrictions on the application of herbicide usage were developed to protect the aquatic values and are effective in doing so. Glyphosate has been registered by the Pest Management Regulatory Agency for selective brush control in forestry since 1984. An extensive review of the 1994 Class Environmental Assessment for Timber Management found that herbicide use is an essential and an acceptable practice. Herbicides are subject to periodic re-evaluations, to make sure registration of the pesticide is still justified based on current scientific knowledge. The Timber Class EA review (2002) included references to over 172 reports of research conducted under the Vegetation Management Alternatives Program, as well as other research to improve tending technology and our understanding of vegetation dynamics, and environmental effects. Re-evaluation of Glyphosate will be part of the current round of active ingredient re-evaluations, scheduled to be completed by 2009.
- Glyphosate works by interfering with metabolic processes that are unique to plants. Birds and mammals do not have these metabolic processes and Glyphosate has little effect on them. Glyphosate does not bioaccumulate, and does not move through the soil. In the agriculture setting, crops sprayed pre-harvest with Glyphosate are available for consumption within 7 days. New and ongoing research on the application of herbicides has significantly improved the deposition and tracking of herbicides. One of the technological advances is an electronic guidance system, AGNAV, required to be used in aircraft applying herbicide on the Superior-Martel Forest.
- The application of herbicides is approved after following clear procedures found within the Forest Management Planning Manual (FMPM), which were developed based on recommendations of the original Timber Class Environmental Assessment (1994), and follow-up compliance monitoring and reporting.
- Herbicide application is an approved and necessary tool to ensure the sustainability of the forest. The buffer zones regulated by the Ministry of Environment guidelines have been designed to protect the values. Forest managers should not be required to add to these buffers without any scientific proof that the buffers are inadequate. Significant investments are incurred to ensure the ecological, social and economic sustainability of the forest from the planning to the actual harvest, renewal and tending. Without the application of herbicides to forest units with an approved and recognized need for herbicide application, the sustainability of the future forest is jeopardized. The 2006 Superior-Martel Forest has passed all test of sustainability which includes forest cover for those dependent on forest cover i.e. wildlife, sustainable wood supply,

and moving towards a desired future forest. These aforementioned criteria are analyzed with the assumption that the required application of herbicide will be used. Without this application or any restrictions beyond what currently exist there will be significant implications on the renewal success of the forest and its sustainability.

I trust you will find that the material in this response substantiates MNR's position regarding this request. My hope is that you can make a decision on all aspects of this request in a time appropriate manner. If for some reason a decision on all aspects of the request can not be made in a quick manner, I would ask that a decision be made on the herbicide restriction as soon as possible. The forest company will soon be preparing their annual operations for the upcoming fiscal year. Due to this request and the lack of spraying this season in the requester's area of contention it is imperative that these areas be treated with herbicide next year.

Please contact Steve Osawa at (705) 235-1173 or Kirk Ellis (705) 864-3173 if you have any questions regarding the details of this package.

Sincerely,



Bob Johnston
District Manager
Chapleau District, MNR

Enclosure

- C: Mr. Michael Harrison, Acting Supervisor, Ministry of Environment
Mr. Rob Galloway, Regional Director, Northeast Region MNR
Mr. David. Repath, Plan Author, Tembec Industries Inc.
Mr. Joel Theriault, behalf of Air Ivanhoe Ltd.

Summary of Issues and Concerns Raised by Air Ivanhoe

This is MNR's response to an individual environmental assessment (IEA) request submitted by Joel Theriault on behalf of Air Ivanhoe regarding the Superior-Martel Forest 2006-2026 Forest Management Plan (FMP). The main argument put forward by the requester, as stated on page 9 of the IEA request, the requester writes "this request is solely for the following" which list concerns with the method and timing of forestry operations in the vicinity of remote tourism waterbodies and bear management areas. Specifically;

- *use of herbicides within the vicinity of specified tourism lakes, feeder streams flowing into specified tourism lakes/rivers, and bear management areas;*
- *site preparation in the vicinity of specified tourism lakes;*
- *harvesting within the vicinity of specified tourism lakes.*

A summary of the requester's involvement in the development of the FMP and associated correspondences are provided in Appendix 1. Also included in Appendix 1 (Tab 3; Step1) is a copy of Joel Theriault's Individual Environmental Assessment request titled "Bump Up Request – Superior Martel 2006-2026 Forest Management Plan" which identifies the requester's concerns.

Summary of MNR's Position

It is the MNR's position that the Superior-Martel Forest 2006-2026 FMP was produced in accordance with the requirements found in the Forest Management Planning Manual (1996 FMPM, and phase in requirements of the 2004 FMPM). The plan provides for the sustainability of the forest.

The current herbicide buffer guidelines and associated restrictions on the application of herbicide usage were developed to protect the aquatic values and are effective in doing so. Glyphosate has been registered by the Pest Management Regulatory Agency for selective brush control in forestry since 1984. An extensive review of the 1994 Class Environmental Assessment for Timber Management found that herbicide use is an essential and an acceptable practice. Herbicides are subject to periodic re-evaluations, to make sure registration of the pesticide is still justified based on current scientific knowledge. The Timber Class EA review (2002) included references to over 172 reports of research conducted under the Vegetation Management Alternatives Program, as well as other research to improve tending technology and our understanding of vegetation dynamics, and environmental effects. Re-evaluation of Glyphosate will be part of the current round of active ingredient re-evaluations, scheduled to be completed by 2009.

Glyphosate works by interfering with metabolic processes that are unique to plants. Birds and mammals do not have these metabolic processes and glyphosate has little effect on them. Glyphosate does not bioaccumulate, and does not move through the soil. In the agriculture setting, crops sprayed pre-harvest with glyphosate are available for consumption within 7 days. New and ongoing research on the application of herbicides has significantly improved the deposition and tracking of herbicides. One of the technological advances is an electronic guidance system, AGNAV, required to be used in aircraft applying herbicide on the Superior-Martel Forest.

The application of herbicides is approved after following clear procedures found within the Forest Management Planning Manual (FMPM), which were developed based on recommendations of the original Timber Class Environmental Assessment (1994), and follow-up compliance monitoring and reporting.

Herbicide application is an approved and necessary tool to ensure the sustainability of the forest. The buffer zones regulated by the Ministry of Environment guidelines have been designed to protect the values. Forest managers should not be required to add to these buffers without any scientific proof that the buffers are inadequate. Significant investments are incurred to ensure the ecological, social and economic sustainability of the forest from the planning to the actual harvest, renewal and tending. Without the application of herbicides to forest units with an approved and recognized need for herbicide application, the sustainability of the future forest is jeopardized. The 2006 Superior-Martel Forest has passed all test of sustainability which includes forest cover for those dependent on forest cover i.e. wildlife, sustainable wood supply, and moving towards a desired future forest. These aforementioned criteria are analyzed with the assumption that the required application of herbicide will be used. Without this application or any restrictions beyond what currently exist there will be significant implications on the renewal success of the forest and its sustainability.

The 2006 Superior-Martel Forest FMP reflects the land use policy direction found in the Crown Land Use Atlas and the tourism guidelines and associated recommendations (i.e. the Management Guidelines for Forestry and Resource-based Tourism 2001, Tourism and Forestry Industry Memorandum of understanding – Guide to Resource Stewardship Agreements) used to help direct negotiations (see Appendix 1: Tab2; Step 3). The forest company met with the requester to identify their values and worked with the requester to develop prescriptions to protect these values i.e. viewscape analysis, timing restrictions on harvest, winter roads to alleviate access concerns, modified harvest etc... The development of these prescriptions were halted when the request was made for an Individual Environmental Assessment and the requester made it clear that it was unlikely that any compromise could be made given the existing manuals process and opposite interest of the two parties.

MNR continually encourages the expansion of the Local Citizens Committee and current membership recruitment efforts have increased the LCC membership. The committee and the MNR have and will continue to seek representation from non-represented sectors such as remote based tourism.

In light of the foregoing, this request should be denied.

Use of Herbicides

Concern

The requester believes that herbicides should not be permitted within the vicinity of specified tourism waterbodies operated on by Air Ivanhoe, or associated rivers, creeks and feeder streams flowing into these water bodies as well as the Bear Management Area operated by Air Ivanhoe on the Superior-Martel Forest. Specifically the request is for an 8 km no herbicide zone on Nemegosenda Lake and River, Bonar Lake, as well as Kapuskasing Lake and River. In addition, the requester would like a no herbicide zone extended to 2 km around all rivers and feeder creeks flowing into these waterbodies and a 2 km zone on the bear management area.

Within the Individual Environmental Assessment request dated April 2, 2006 (see Appendix 1: Tab 3; Step1) the requestor identifies what he thinks are two main

areas of concern in regards to the usage of herbicides: 1) MNR depends on old documents such as Aerial Spraying for Forest Management 1991 which are out of date and do not include new research findings, 2) Serious health and environmental effects are being caused by glyphosate and 2,4-D, and there is not enough known about either of these herbicides, and the planning team did not adequately considered alternatives.

MNR Response

The registration of pesticides in Canada is the responsibility of the Pest Management Regulatory Agency (PMRA) of Health Canada. Their mission is to protect human health and the environment, while still allowing access to pesticides necessary for effective pest management. They assess the risks associated with the use of a pesticide, and weigh those risks against the value of that product as part of a sustainable pest management strategy. This risk-benefit analysis is the basis of the regulatory decision to register a product for use, and set constraints on the way the product is used. These regulatory decisions are based on results of required studies, and following a search of relevant related scientific literature. Once registered, pesticides are subject to periodic re-evaluations, to make sure registration of the pesticide is still justified based on current scientific knowledge.

The aerial application of herbicides is an essential technique for the control of unwanted vegetation in Ontario's forest. On the Superior-Martel Forest aerial spraying is used primarily for conifer release and/or chemical site preparation. Conifer release is a tending operation whereby the application of herbicides is used to remove or reduce the growth of competing vegetation in order to maintain survival and enhance the growth of established conifer seedlings on newly regenerated forest. Chemical site preparation is the application of herbicides to non-regenerated sites in order to control vegetation that would otherwise impede the establishment and survival of conifer seedlings yet to be established.

In Canada, four herbicides are registered for aerial application to forests: glyphosate (trade names: Forza, Vantage, Vision, Vision Max), 2,4-D (various trade names), triclopyr (Release), and hexazinone (Velpar). All these herbicides work by interfering with metabolic processes that are unique to plants. Birds and mammals do not have these metabolic processes and these herbicides have little effect on them. These herbicides differ in their ability to control different plant species (for example: 2,4-D does not control grasses and red pine is not affected by hexazinone).

2,4-D is not being applied on the Superior-Martel Forest, nor has it been applied on either the Superior Forest or the Martel section of the former Pineland-Martel for over a decade. It is very unlikely that 2,4-D will be used on the Superior-Martel Forest in the future so no further discussion on this herbicide is provided.

Glyphosate was introduced in 1974 for non-selective weed control, and registered for selective brush control in forestry in 1984. PMRA has evaluated glyphosate and approved it for aerial application in forests. The re-registration eligibility decision for glyphosate was released by the U.S. Environmental Protection Agency in September 2003. Re-evaluation has not been completed in Canada, but will be part of the current round of active ingredient re-evaluations, scheduled to be completed by 2009.

After an herbicide is registered for use in Canada, its use in Ontario is regulated through the Pesticides Act (PA) by the Ministry of the Environment. The PA has extensive requirements regarding public notification and license requirements for users and sellers. We depend on the Ontario Pesticides Advisory Committee to advise the Minister of Environment if a pesticide is compromising human health or environmental quality. The Pesticides Act and the Crown Forest Sustainability Act ensure that registered pesticides are used safely with due consideration for sustainability of the environment. The use of herbicides as a forest management tool was extensively reviewed as part of the Class Environmental Assessment (EA) for Timber Management (1994). This included a broad public hearing and consultation process. The assessment determined that herbicide use is an essential and acceptable practice and that the appropriate public safety and environmental controls are in place. During the Timber Class EA Review and the resulting Forest Management Class EA Approval (2004), the use of herbicides was not raised as a main issue by any stakeholder group or the public.

In Ontario, over 90% of the herbicide applied in the forest is glyphosate, under the trade name VISION. Glyphosate has been used extensively in forest management for more than 20 years. This is the same herbicide widely used domestically and in agriculture under the trade name Roundup. It is effective in controlling a variety of vegetation, does not bioaccumulate, and does not move through the soil. In the agriculture setting, crops sprayed pre-harvest with glyphosate are available for consumption within 7 days.

There are a large number of studies on the health effects of glyphosate (For a recent review see Williams, G.M, R. Kroes and I.C. Munro. 2000. Safety evaluation and risk assessment of the herbicide Roundup and its active ingredient glyphosate for humans. *Reg. Tox. Pharm.* 31: 117-165). Environmental effects have also been studied (see Sullivan, D.S and T.P. Sullivan. 2000. *Non-target impacts of the herbicide glyphosate*, 5th edition. Applied Mammal Research Institute, Summerland, B.C, or Lautenschlager, R.A. and T.P. Sullivan. 2002. Effects of herbicide treatments on biotic components in regenerating northern forests. *For. Chron.* 78(5): 695-731).

As part of the 1994 EA decision MNR was required under T&C 102 to ensure that tending and protection programs were conducted in accordance with current scientific knowledge by maintaining policies and procedures that ensure proper

and safe use of registered and approved products; investigating new technologies; testing alternative control methods; and supporting research initiatives. We have done, and continue to do this. The Timber Class EA review (2002) included references to over 172 reports of research conducted under the Vegetation Management Alternatives Program, as well as other research to improve tending technology and our understanding of vegetation dynamics, and environmental effects.

The forest company is required to follow the Ontario Ministry of Environment / Ontario Ministry of Natural Resources buffer zone guidelines for aerial application of pesticides in crown forest of Ontario (1992). These guidelines were developed to protect the aquatic values. Current research led by Dr. Dean Thompson of the Canadian Forest Service shows that these guidelines are effective at protecting waterbodies. In general, spray equipment is getting more refined, and knowledge of aircraft tracking methodologies and herbicide deposition are improving. One example which is implemented on the Superior-Martel Forest is the use of the electronic guidance system AGNAV which utilizes Global Positioning System (GPS) technology to aid the pilot with directional guidance and other navigation information required to carry out precise aerial applications while logging detailed application information (i.e. height, position, flow rate etc...) all of which can be downloaded, plotted, reviewed and archived.

Direction regarding the requirements associated with herbicide use is found within the Forest Management Planning Manual (FMPM), based on recommendations of the original Timber Class EA (1994), and follow-up compliance monitoring and reporting. The recommendations from the *Aerial Spraying for Forest Management* manual are covered by the direction in the FMPM. MNR District staff review spray descriptions and plans that are submitted by the forest company before the spray operation, to ensure values are protected and it is consistent with the FMP.

The application of herbicides is restricted to a very short application window dependent on growing season and daily weather conditions. Extensive public consultation is conducted as per the requirements of the FMPM to ensure the public are made aware of the scheduled areas for spray. This starts with the identification of areas which may be eligible for spray during the production of the FMP and associated information centers and public notices. As well, there is public notification at the annual work schedule stage which entails two newspaper advertisements, the first at least 30 days before scheduled date of spray commencement, and another advertisement at least 7 days before spray commencement. In addition, a mailout to all people listed in the District mailing list for any Township with proposed spraying or any adjacent township within 1 km of spray location is notified. All treatment blocks are posted no earlier than seven days prior to the commencement of spray operations with warning signs that meet the legislated requirements. The signs remain in place for a minimum of thirty days following the herbicide application. All areas treated aurally meet

or exceed the requirements of the MOE as defined in the Buffer Zone Guidelines for the Aerial Application of Pesticides in Crown Forests of Ontario (January 1993).

Technology and accuracy of herbicide spray operations continues to improve, with use of smart booms, ag-nav, greater use of Global Positioning Systems and Geographic Information Systems, helicopter applications, and a maturing spray application industry. The MNR and forest industries are partners in various research initiatives around spray applications and are incorporating findings and best practices that have emerged from this research.

The current MOE/MNR buffer guidelines and associated restrictions on the application of herbicide usage were developed to protect the aquatic values. The buffer zones regulated by the Ministry of Environment guidelines have been designed to protect the values. Any more restrictions on the usage of herbicide in existing artificially or naturally renewed areas or future harvest areas will have major implications on the renewal success and subsequent sustainability of the forest. A restriction on herbicide usage has the potential to impact wood supply through future wood demands. One aspect to the management of the forest is to meet the social and economic requirements of the forest. The application of herbicides helps by providing for a mix of forest types that are desired from the forest as well as trying to produce those forest types and subsequent crop tree species in a manner that is the most time/cost efficient, and for optimum quality. The desired result from the application is increased height and diameter growth on the crop trees that should result from the increased light, lack of competition for water and nutrients as well as the breakdown of the organic matter which releases nitrogen and other micro and macro elements necessary for growth. The management of forest cover and its impacts on wildlife habitat is modeled for during the development of the FMP to ensure that wildlife habitat needs for 19 regionally selected wildlife species are being met through the management of forest cover. The application of herbicides is only conducted on approved forest units within the approved FMP and associated set of objectives that if met will help ensure sustainability of the forest.

Silviculture prescriptions for the various forest units are developed during the production of the FMP to help meet the objectives set out in the FMP. These Silviculture prescriptions detail the harvest method, renewal and tending treatments. If there are any concerns with the prescriptions they should be raised during the development of the FMP and prior to the implementation of the prescription which begins with the harvest. There is a substantial investment required to implement the silvicultural prescriptions and it is not realistic to eliminate the tending portion of the prescription after the harvest plant/seeding has been conducted.

Action to Date

The first concurrence granted by the MOE stated that "I concur with your approval of operations in respect of activities and areas unaffected by the April 2, 2006 individual EA request, including seeding and planting within the eight kilometer buffer zone, on condition that clarification of the extent of such unaffected activities and areas is confirmed in writing to the MNR by the requester prior to the commencement of site preparation and tending activities as related to the second requesters concerns". On June 5, 2006 Tembec Industries Inc. (Chapleau) met with Air Ivanhoe to confirm the area of contention for the application of herbicide (See Appendix 1; Tab 3; Step 12 and 14). The area of contention covers approximately one-third of the unit located primarily within the Martel section of the unit (Northeast quadrant). Subsequently, The MOE provided a second concurrence which permitted herbicide applications to go ahead outside of the confirmed area of contention. The 2006-2007 Superior-Martel Forest Aerial Spray Plan was submitted by Tembec Industries Inc. Chapleau and reviewed by the Chapleau District MNR ensuring it was consistent with the FMP and the second concurrence. On page 7 of the 2006-2007 Aerial Spray Plan it states "Areas within the no spray zone as provided to the Minister of Environment will not be sprayed until the MOE gives approval to do so". All areas within the no spray zone are listed in Appendix 4 of the Aerial Spray Plan.

The 2006 aerial spray was conducted in the area of non contention and subsequently those areas within the no spray area of contention, and if not too late and/or not sprayed next season will most likely be invaded with unwanted vegetation, deviate from the approved and recommended silviculture prescription and potentially impact the long term sustainability of the forest.

Summary

- Glyphosate has been federally registered by the Pest Management Regulatory Agency for selective brush control in forestry since 1984.
- An extensive review of the 1994 Class Environmental Assessment for Timber Management found that herbicide use is an essential and an acceptable practice.
- Herbicides are subject to periodic re-evaluations, to ensure registration of the pesticide is still justified based on current scientific knowledge. The Timber Class EA review (2002) included references to over 172 reports of research conducted under the Vegetation Management Alternatives Program, as well as other research to improve tending technology and our understanding of vegetation dynamics, and environmental effects. Reevaluation of Glyphosate will be part of the current round of active ingredient reevaluations, scheduled to be completed by 2009.
- Herbicides work by interfering with metabolic processes that are unique to plants. Birds and mammals do not have these metabolic processes and

these herbicides have little effect on them. Glyphosate is effective in controlling a variety of vegetation, does not bioaccumulate, and does not move through the soil. In the agriculture setting, crops sprayed pre-harvest with glyphosate are available for consumption within 7 days.

- 2,4-D is not being applied on the Superior-Martel Forest, nor has it been applied on either the Superior Forest or the Martel section of the former Pineland-Martel for over a decade and it is not anticipated that it will be used in the future.
- The application of herbicides is approved after following clear procedures found within the Forest Management Planning Manual (FMPM), which were developed based on recommendations of the original Timber Class Environmental Assessment (1994), and follow-up compliance monitoring and reporting
- Advanced herbicide application and tracking technology such as electronic guidance system AGNAV is being used on the Superior-Martel Forest.
- It is important to note that a continued restriction on the usage of chemical tending in this area will have significant implications on the renewal success of this area and the achievement of objectives set out in the approved FMP which in turn will impact the desired future forest. Such a restriction has the potential to impact wildlife habitat that have been modeled for through the management of forest cover and potential implications on future wood supply.

It is the MNR's position that herbicides are a safe and necessary tool and the implications of a continued restriction on their use have the potential to jeopardize the sustainability of the Superior-Martel forest.

Summary

It is the MNR's position that the Superior-Martel Forest 2006-2026 FMP was produced in accordance with the requirements found in the Forest Management Planning Manual (FMPM 1996, and phase in requirements of the 2004 FMPM). The plan provides for the sustainability of the forest.

The current herbicide buffer guidelines and associated restrictions on the application of herbicide usage were developed to protect the aquatic values and are effective in doing so. Glyphosate has been registered by the Pest Management Regulatory Agency for selective brush control in forestry since 1984. An extensive review of the 1994 Class Environmental Assessment for Timber Management found that herbicide use is an essential and an acceptable

Superior-Martel 2006 FMP
Individual EA Response

practice. Herbicides are subject to periodic re-evaluations, to make sure registration of the pesticide is still justified based on current scientific knowledge. The Timber Class EA review (2002) included references to over 172 reports of research conducted under the Vegetation Management Alternatives Program, as well as other research to improve tending technology and our understanding of vegetation dynamics, and environmental effects. Re-evaluation of Glyphosate will be part of the current round of active ingredient re-evaluations, scheduled to be completed by 2009.

Glyphosate works by interfering with metabolic processes that are unique to plants. Birds and mammals do not have these metabolic processes and glyphosate has little effect on them. Glyphosate does not bi-accumulate, and does not move through the soil. In the agriculture setting, crops sprayed pre-harvest with glyphosate are available for consumption within 7 days. New and ongoing research has significantly improved the deposition and tracking of herbicides. As such, one of the most new and advanced technological advances the electronic guidance systems AGNAV is implemented on the Superior-Martel Forest.

The application of herbicides is approved after following clear procedures found within the Forest Management Planning Manual (FMPM), which were developed based on recommendations of the original Timber Class Environmental Assessment (1994), and follow-up compliance monitoring and reporting.

Herbicide application is an approved and necessary tool to ensure the sustainability of the forest. The buffer zones regulated by the Ministry of Environment guidelines have been designed to protect the values. Forest managers should not be required to add to these buffers without any scientific proof that the buffers are inadequate. Significant investments are incurred to ensure the ecological, social and economic sustainability of the forest from the planning to the actual harvest, renewal and tending. Without the application of herbicides to forest units with an approved and recognized need for herbicide application, the sustainability of the future forest is jeopardized. The 2006 Superior-Martel Forest has passed all test of sustainability which includes forest cover for those dependent on forest cover i.e. wildlife, sustainable wood supply, and moving towards a desired future forest. These aforementioned criteria are analyzed with the assumption that the required application of herbicide will be used. Without this application or any restrictions beyond what currently exist there will be significant implications on the renewal success of the forest and its sustainability.

The 2006 Superior-Martel Forest FMP has followed the land use policy direction found in the Crown Land Use Atlas and the forest company did use the guidelines and associated recommendations (i.e. the Management Guidelines for Forestry and Resource-based Tourism 2001, Tourism and Forestry Industry Memorandum of understanding – Guide to Resource Stewardship Agreements)

MNR continually encourages the expansion of the Local Citizens Committee and current membership recruitment efforts have increased the LCC membership. The committee and the MNR have and will continue to seek representation from non-represented sectors such as remote based tourism.

Conclusion

In conclusion of the information above, MNR believes this request should be denied.