

**Hillsborough River Association's Comments on  
Towards a New Forest Policy for Prince Edward Island.  
July 31, 2024**

This document provides an informative and fairly thorough overview of the issues and as well as an analysis of many facets related to forest policy. The key issues identified seem to be very pertinent.

There is a need to address the differences between natural forests (those never cleared for agriculture) and the regenerated forests growing on land once cleared and tilled for generations. Should measures be used to improve the soil quality on these sites. There is also a need to address the current land appraisal system to fairly address the value of nature so as to designate more public land.

There is also a need to recognize the value of individual planted trees. A Red Oak seeded in 1980 and felled by Fiona produced the following eight-foot lengths - two 20 inch logs, two 16 inch and two 12 inch logs and firewood (not measured but substantial).

**Issue 1: Legislative Framework.**

The Forest Management Act currently has a narrow definition of how forests contribute to societal values. It should include more on the social, cultural, educational and recreational values of forests and should recognize the rights of First Nations. There is a need to ensure that the values of forests include retention and encouragement of springs, seeps, bogs, forested wetlands, forests, hedgerows, and forest diversity of native species especially those in headland water areas.

Answers to questions:

1. It should be defined with a more holistic view, including the environmental, social, cultural, educational and recreational values as well as economics including the holistic value of nature.
2. The Minister should encourage forest retention and management on both private and public forested lands. These provide guidelines on private forested lands as well as public lands.
3. The State of Forest Report should be updated and released publically at a minimum every 10 years.
4. The Act should include both aspirational and operational objectives.
6. Programs which provide and encourage holistic forest management, forest retention, and diversity on both private and public lands and the retention of a forest nursery to produce native trees and shrubs to support forest and watershed management.
7. The Act should promote all values including the social, cultural and recreational values. It should also address the need for forest structural components including legacy trees and old growth forest retention and conservation.

**Issue 2: Maintaining Forest Area.**

Maintenance of forest area is of critical importance especially in areas with springs, seeps, bogs, forested wetlands, and well fields. It is concerning to see that one of the main pressures on forest

loss is for residential development. There is a need for protection of forest lands overall in the province. While the recommendations on P. 3 may have value, there is a need to address the holistic value of forests and to respect the intent of green zoning plans so that variances are not used to overcome their professed intent. The value of forests and hedgerows in water recharge need to be addressed especially as population grows and water demand intensifies with the higher population density within municipalities.

Answers to questions:

Question 1: The Provincial Government needs to have larger municipalities having well field areas invest in techniques to enhance water absorption and ensure the protection of water quality in well fields not just in the municipality but in well fields outside their municipality.

Question 2: Create programs and financial support to increase the legislated buffer zones on watercourses.

Question 3: Yes watershed groups could play a role in forest protection, especially in areas that are not included within municipalities. If further financial resources were provided, they could encourage buffer zones near waterways are maintained and the forests within the watershed are conserved while biodiversity of native species is increased.

### **Issue 3: Encouraging Better Private Woodlot Management.**

P.3 It may be a good idea to review and update the Ecosystem-Based Forest Management Standards manual to ensure they include holistic values of forests (i.e. environmental, cultural, social, recreational, etc) and retain and encourage the development of old growth forests and their attributes.

P. 4 Need to incorporate more hardwoods if possible, to create a more sustainable bio-diverse forest in the future.

The ownership rights of private landowners should be respected within the tenure of legislation.

Questions:

1. Need to establish more clear guidelines on balance between hardwood vs softwood treatments to ensure a sustainable forest

2. Yes

4. Yes

5. No. It should also include social, cultural, educational, recreational values

6. Establish or reestablish an attractive incentives program. Recognize good management by private woodlot owners. Provide a tax credit for small private forest landowners that are implementing holistic forest management or forest retention programs.

Other Questions:

Address the needs respecting beaver management in forested buffers so as to allow finfish access.

Address the role of forests in capturing sediment eroded from agricultural lands, forests, and structural development.

#### **Issue #4 Managing Public Forests Management plans for Public Forested Lands must be completed in a more timely manner.**

FFWD needs more resources to meet its responsibilities.

Public forest lands should be retained as public lands. Leasing or transferring lands to non-profit groups and/or First Nations might be one way to improve management but only with the proviso that holistic forest management is implemented and monitored. The failure to address the provisions of biomass sustainable forest management suggests that this is not a good option. There were also once leases on certain recreation trails. The duration of the Macphail's Woods Ecological Forestry Project lease should be recognized - cite the year (its not several years).

P. 7 Questions:

1. The holistic values of forests should take precedence over forest harvest revenue.
2. Yes
- 3 & 4. These lands should be retained and managed by the Province as public land.
5. No! It would be a profound mistake to privatize public forested lands.

#### **Issue 5: Seedling Production.**

p.8 Need to produce more native hardwood seedlings (trees and shrubs).

"Silvicultural techniques that favour late-successional hardwoods in natural stands are just as important"

Note: There is a need to have more diverse natural forests and plantations. Interplanting can be one means of achieving this goal as is natural regeneration in plantation gaps. Assess plantations and determine the diversity within the stands coded as plantations. While they were planted usually as one or more softwood species, they generally are not one tree species. They are successful multi-species plantations developed over the years under the FFWD programs.

Questions:

2. Species that appear to be tolerant to the predicted changes in climate over the predicted tree growth period. Red Oak, Red Maple, and White Pine are important species with diverse applications and a good ability to produce seed to regenerate over significant distances from seed trees. The goal should be multi-generational forests. Plantation establishment is one tool to address natural forests verses forests that have regenerated on old field origin sites.
3. Rather than a fixed percentage, address the needs of watershed groups. Note the value of both native trees and shrubs for these programs. Also note the value of these plantings in producing seed sources in areas where they are not present (e.g. Red Oak, White Pine established as natural seed source orchards).
4. Not at this time unless the special rate for watershed groups (\$ .50 + HST per 1 gallon tree or shrub) can be addressed and the needs respecting native tree and shrub genetic diversity and improvement is addressed.

#### **Issue 6. Sustainability of Biomass Supply**

Biomass production needs to be a tool to support multi-generational bio-diverse native forests

with a long term goal of old growth forests.

Biomass proponents should have one or more facilities to allow landowners to sell their forest grade biomass material to biomass contractors.

Questions:

1. Audit the designated performance measures and enforce or support the enforcement of contractual performance measures. Further develop and maintain the Eco-system-Based Forest Management Standards Manual.

### **Issue 7. Woodlot Owner Organization.**

P. 11 Question 1. Yes. The government could establish a way for groups to work together to share knowledge and expertise as well as resources. A partnership organization or another type of collaboration. They could also look at grants or other funding sources for initiatives.

### **Issue 8: p. 11 Forest Industry Support.**

Agree with this statement. "The forest industry is both a visible and an invisible sector of the province's economy..."

Explore the potential for small scale forest sawmills to produce stamped lumber compliant with National Building Code criteria.

Questions:

1. Yes provided it does not compromise the forest sustainability mandate of the Minister. If that cannot be achieved, another ministry should lead support initiatives.

3. Yes.

4. In respect to the second part of this question, yes. There is a need for some forest harvesters to address the challenges on old field origin forests as well as the challenges imposed by hurricanes and other severe storm events.

5. While there needs to be better overall communication and education on the value of forests for the province and the need for wise management of forest resources, the forest industry needs to define its needs.

### **Issue 9. The Role of Forests in Carbon Capture.**

P. 13. Net Zero Framework goal for government to work with the forest industry and woodlot owners to make PEI a leader in environmentally progressive forest practices is really important. A private sector organization has been created to develop carbon credits on Island woodlots.

### **Issue 10. Forests and Quality of Life.**

This issue is the most important one. When viewed holistically the value of forests can include all aspects--economical as well as environmental, cultural, social, etc. This should perhaps be considered the starting point or the overarching goal of the new policy or framework. At present,

there is too much emphasis on the specific economic value of the forest industry and not enough on the overall health of forests benefitting the lives of Island residents.

Questions p. 15

1. Yes
2. Yes. In addition, it should support expansion of watercourse buffers and the creation of a wider stream side corridor and the encouragement of strategically placed, bio-diverse hedgerows to reduce soil erosion and retain moisture.
3. Yes
4. Yes. Review the series of publications on the value of nature in Canada.

### **Issue 11 Preserving Natural Forest.**

This issue is also very important. We need more protected forested areas in PEI, either protected areas or OECMs.

The suggestion at the bottom of p. 16 that the NA Protection Act can be used to protect private land through the use of restrictive covenants is key.

P.17. It is very good to see that FFWD has an ongoing acquisition strategy to acquire more forested lands.

"Ongoing procurement priorities include large forest patches, interior forest, upland hardwoods, wet forest, habitat for species of conservation concern and areas with connectivity significance"-- all good goals.

Questions:

1. Yes
2. They seem to be good. However, there is a need to procure and protect natural forests especially those with springs, water seepages, treed wetlands, and edge habitat to those areas, There is also a need to address the straight economic valuation of forest lands and provide extra appraisal value to acquire appropriate lands. Note: landowners are refusing to sell their land at the appraised value as there is insufficient appraisal adjustment to achieve the higher level goal of protecting public forest, additive watercourse buffer land, and water recharge areas. The holistic valuation system needs to be quantified.
3. Tax credits could be offered to private landowners protecting their forest or natural area land.

### **Issue 12. Encouraging more resilient forests.**

The prediction of more severe wind-storms, short duration and intense rain events, tidal surges, and other extreme weather events needs to be addressed. The province should create measures to utilize high value hardwoods and softwood, lumber and pulp salvage, and biomass utilization downed by such events. As well, the province and federal government need to expand and revitalize forest fire equipment holdings and trained forest firefighter sharing to address the demands.

Questions p. 18

1. Increase funding to address the challenges.

2. Should grow more climate resilient native species in order to be ready to meet the need. Need to create an holistic forest plan for the future, taking climate change into consideration, in order to be ready to act.

**Issue 13: Increasing Our Readiness for the Next Fiona.**

Have one or more facilities to allow landowners to sell their forest grade biomass material to biomass contractors or heat plants.

See forest fire management recommendation (Issue 12).