

Collection of Detailed Submissions (Permission Given)

The following collection of detailed submissions from organizations, municipalities, environmental professionals, and businesses were received during the Phase 1 public consultation (May 28, 2019-October 1, 2020) on 'A Home for Nature: Protected Areas Plan for the Island of Newfoundland'. Permission from each respondent has been given for this information to be made available to the public. Please click below to view submissions from the following respondents.

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*Conserving
Canada's
Wetlands*

A Submission to the:

Wilderness and Ecological Reserves Advisory Council

As Part of the Public Engagement Process on:

A Home for Nature: Protected Areas Plan for the Island of Newfoundland

Submitted by:

Ducks Unlimited Canada

September 25, 2020

Organization Contact:

Danielle Fequet

Conservation Programs Specialist

Ducks Unlimited Canada

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St. John's, NL A1C 3L3



Conserving
Canada's
Wetlands

**Ducks Unlimited Canada Response on the Release of:
A Home for Nature: Protected Areas Plan for the Island of Newfoundland**

Ducks Unlimited Canada (DUC) is a national charitable organization that has been in operation since 1938. Our mission is to conserve, restore and manage wetlands and associated habitats for North America's waterfowl. These habitats benefit other wildlife, people and our environment. We partner with government, industry, non-profit organizations and landowners to get our work done so we can connect people to nature and make a healthier world for future generations. Our goal is to ensure abundant wetlands and waterfowl for generations to come, while improving Canadian lives.

DUC appreciates the opportunity to provide input on *A Home for Nature: Protected Areas Plan for the Island of Newfoundland*. In Newfoundland and Labrador, we have a unique opportunity to plan a future that allows for both conservation and sustainable use of our environment. It is essential to find a balance between long-term environmental, social and economic goals. Many jurisdictions around the world have already missed this opportunity, but we have a chance to get it right. DUC believes that effective conservation maintains healthy ecosystems and meets conservation targets while also allowing people to continue using the land in traditional and sustainable ways.

DUC's mandate focuses on wetlands, which support biodiversity by providing diverse habitats for waterfowl and other wildlife. They also serve essential functions within a watershed, including include water storage and flood reduction, groundwater recharge, nutrient assimilation, sediment filtration, and removal of pathogens and other contaminants. Wetlands also store carbon and provide spaces for outdoor recreation. Thus, in addition to providing essential habitat, there are numerous socio-economic reasons to protect our wetlands.



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Release of the Protected Areas Plan in Newfoundland is a commendable milestone, and many of the proposed protected areas outlined in the Plan encompass wetland and waterfowl habitat. Collectively the candidate sites encompass almost 940km² of wetland, however, in general we would like protected areas planning to incorporate a greater focus on identifying and protecting significant wetlands.

Granting protected status to candidate areas will support Canada's commitment to protect 17% of our land and inland waters nationally, however, public support for adoption of protected areas is essential for making progress. DUC believes it is vital to engage local people in meaningful consultation and allow them to contribute to decisions being made about the areas they are connected to. Each candidate area should be evaluated in the context of community consultation to determine which areas to advance protection for in the near term.

Ducks Unlimited Canada supports the designation of more protected areas in Newfoundland in principle and would like to see the Plan advance with significant local consultation for each of the candidate areas. We hope to see the NL government's commitment to environmental conservation continue and progress made towards establishing new protected areas in Newfoundland.



Newfoundland and Labrador Forest Industry Association
P.O. Box 1052
Corner Brook, NL Canada A2H 2N2

www.nlfia.ca



September 30, 2020

WERAC Secretariat - Wilderness and Ecological Reserves Advisory Council
Department of Fisheries, Forestry and Agriculture
Natural Areas Section, Land Management Division
P.O. Box 2006
Corner Brook, NL A2H 6J8

RE: A Home for Nature: Protected Areas Plan for the Island of Newfoundland

Dear WERAC Secretariat Members,

The NL Forest Industry Association (NLFIA) welcomes the opportunity to comment on your recently released document titled: A Home for Nature: Protected Areas Plan for the Island of Newfoundland. We commend the Wilderness and Ecological Reserves Advisory Council (WERAC) for its effort to bring this initiative forward and recognize both its genesis, its long-term development, and its significance to our province, and beyond.

Given the importance of the forest industry to the well-being of our citizens, NLFIA strongly supports a collaborative approach to help finalize proposed boundaries and deliver a final plan that can meet national and international protected area targets. We trust the final protected areas framework can ensure the long-term viability of natural systems and can assist in improving future forest governance. We take this opportunity to provide a contemporary context of the forest sector and offer several recommendations for reaching protected areas targets taking into account the importance of the forest resource to our industry and to the economy of the province.

The historical significance of the forest resource to the people of Newfoundland and Labrador (NL) has been long recognized. For countless generations, our citizens have relied on forest resources and forest-related industries for their existence, livelihood, and way of life. Importantly, the future of NL's forest industries depends on the long-term health and sustainability of our forest resources. Consistent with aspirations of WERAC, there is also a growing awareness within, and external to, the forest sector of the many goods and services offered by forest ecosystems, most notably, production of lumber and newsprint, domestic and industrial energy, agricultural bedding, sequestration of carbon, regulation of the quality



and quantity of water, provision of residential and recreational amenities, and protection of biota.

To this end, the NLFIA continues to work with its partners to foster the growth and competitiveness of the sector. Notably, incorporating protected areas into sustainable forest management strategies represents an important objective of NLFIA. Our Association represents 96 percent of the province's commercial forest resource production. Valued at \$383 million annually and providing direct and indirect employment to over 5,000 people, the sector contributes significantly to the rural economy of NL. Established in 2017, the Association's founding members believe collaboration and partnerships are key to strengthening, growing and transforming the forest industry in the province.

In our review of your Protected Areas Plan, we provide the following comments for consideration:

- Protected areas (PAs) are key for biodiversity conservation, but NLFIA has concerns that the proposed boundaries, with their concomitant reduction in annual allowable cut (AAC), will have serious impacts on current and future economic opportunities within the forest sector. In selected areas, these boundaries generate unequal access to potential benefits of the forest resource, and in turn, exacerbate job losses. Further reductions in AAC will be highly detrimental to the sector and to the province's economy, particularly to rural NL. There is every reason to avoid such impact given the province, with its current debt load, will be further challenged in a post-COVID economy.
- Conservation of our land base and our natural areas is vital to the long-term health of our industry. Although the establishment of protected areas is one way to achieve this, it is not the only way. Given the renewable nature of our industry, and the fact that in NL forests are managed on 160-year rotations, we contend a more balanced approach is necessary. For example, there is opportunity to augment protected area policy with other policy instruments. Moreover, combinations of strategies require decisions on trade-offs, making it important to develop more holistic management strategies where both synergies and trade-offs are considered. Other approaches can provide for continuity of ecosystem structure, function, and species composition and support the integration of environmental, economic, and cultural values.
- Canada is recognized as a leader in sustainable forest management and resource stewardship. Forest management decisions and activities are founded on science-based research and established planning processes. In NL, the provincial government is responsible for regulating and managing our forest resources and NLFIA members work with government to ensure Our Forests are protected and managed responsibly. The Province's Environmental Management System is registered to the ISO 14001:2015 standard and provides a framework for forest management activities on crown land. In addition, Corner Brook Pulp and Paper Ltd. is certified to a sustainable forest management standard and a fiber sourcing standard which require validation from third parties to ensure management of the



resource is being carried out responsibly and considers all stakeholder values, including protected areas.

- As part of the forest management planning process, the *Forestry Act* requires an overarching, 10-year Sustainable Forest Management Strategy. Ecosystem management and forest protection are critical components of this strategy and this process enables stakeholders to provide input and respond to concerns respecting the local environmental effects of forestry activity. This input often results in numerous restrictions including, but not limited to, other resource uses such as agriculture, mining, protective interests including wildlife, endangered species, tourism, view scape protection, outfitting operations, traditional and indigenous land areas, municipal land use, cottage areas, protected water supplies, and recreation.
- In recent decades, the forest management planning process has cumulatively reduced the productive forest available to industry, from approximately 36 percent of the island's total landbase to 20 percent. Furthermore, 83 percent of this productive area has some form of additional restrictions placed upon it. The continuous cumulative erosion of the forest industry's landbase over the past 20 years has resulted in an annual 26 percent reduction of available softwood fiber. It is imperative to understand that further constraints on the productive landbase will jeopardize current industries. Moreover, it will threaten future potential offered by an emerging bioeconomy in the province.
- The sector is also gravely concerned with the impending spruce budworm infestation and the further reduction in inventory levels. The 1970's outbreak resulted in 90 percent of productive forests of the Island being impacted with an estimated loss of 5,100,000 cubic metres. Quebec alone has suffered moderate to severe defoliation on over 7 million hectares since 2006 and we are on the precipice of another such infestation.
- NLFIA and the Department of Fisheries, Forestry and Agriculture (FFA) are currently completing a wood supply validation project where initial findings indicate significant variances in the inventory available for harvest. The validation and accuracy of any inventory, protected or otherwise, is critical data in determining sustainability and viability of all users. Again, fiscal constraints have not allowed the province to invest in more reliable inventory technologies such as LiDAR that allow for greater identification and accuracy, critical to forest management regimes.
- A key action of the recent provincial sector work plan, **The Way Forward on Forestry**, is to increase industry's timber allocations and harvest levels by 20 percent. As the sector invests and transitions from a traditional pulp focused inventory to an inventory needed to support new innovative products, industry is gravely concerned that meeting targets will not be possible with any further decreases in the productive land base. In addition, any decrease in AAC will require a substantial increase and investment in intensive forest management (i.e. silviculture and forest protection).
Going forward, the capability to grow more product on less land will be critical.



However, in recent years, provincial fiscal constraints have caused forest renewal and protection budgets to plummet. Consequently, little to no funding has gone into site preparation, pre-commercial thinning and tree improvement. We as industry feel this will have a significant negative impact on future inventory levels and long-term sustainability.

- Simply designating an area as “Protected” does not ensure a forest or ecosystem will remain in its current condition or continue to represent the values for which it was originally protected. Threats of forest pests like spruce budworm, blowdown from excessive winds and increased fire risk from a warming climate are issues that require management. It is noteworthy that national parks, as representatives of natural areas, allow prescribed burning and planting in an effort to re-establish forests that had been disturbed and not naturally regenerated. As an industry, we find a contradiction in the fact that this proposed protective plan will accommodate the potential for economic non-renewable deforestation activities, however, disqualifies renewable forestry practices.
- Finally, over the years, the NL forest industry has compromised willingly, but in some cases unknowingly, to the accumulation of existing restrictions. Historically, areas proposed by WERAC through the Natural Areas System Plan process were voluntarily avoided by industry and removed from the protective land base with little or no negotiation. However, these final areas are vastly greater than anything previously presented. It has also come to the attention of NLFIA members that the areas have once again been removed, prior to the public release of this document and without industry consultation. After 25 years, if this is to be the FINAL Protected Areas Plan, then NLFIA members find it extremely disappointing and unacceptable that WERAC assumes industry will simply agree.

As stewards of the forest, our member companies are committed to the sustainable use of Our Forests. Sustainable forest management provides for the long-term health of forests while providing social and economic benefits for our residents. We can no longer support the additional erosion of our productive land base and future inventory. We trust WERAC will welcome our input and will collaborate with NLFIA to ensure the final plan provides for sustainable forest management and improved forest governance.

Our FORESTS Our FUTURE

Sincerely,

Bill Dawson
Executive Director

cc: Hon. Elvis Loveless, Minister - Fisheries, Forestry and Agriculture



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September 30th, 2020

WERAC Secretariat
Wilderness and Ecological Reserves Advisory Council (WERAC)
c/o WERAC Secretariat
Department of Environment, Climate Change and Municipalities
Natural Areas Section, Land Management Division
P.O. Box 2006
Corner Brook, NL
A2H 6J8

RE: Submission Regarding the proposal "A Home for Nature: Protected Area Plan for the Island of Newfoundland"

Nalcor Energy (Nalcor) and its subsidiary company Newfoundland and Labrador Hydro (NLH) have reviewed the recent proposal drafted by WERAC "A Home for Nature: Protected Area Plan for the Island of Newfoundland". Based on our review we are providing this submission as part of the Public Consultation Process.

Nalcor and NLH are committed to environmental stewardship and responsible development to ensure the protection of our natural resources while maintaining our commitment to the safe and reliable generation and transmission of electricity. NLH has worked collaboratively with Parks and Natural Areas over many decades to continue to maintain transmission line infrastructure located within the Bay du Nord Wilderness Reserve (BDNWR), which was established subsequent to our development in the area. We have, and will continue to comply with all requirements under the Wilderness and Ecological Reserve Act (WERA).

Under the Wilderness Reserve Regulations NLH is permitted to use existing access trails within the BDNWR for the sole purpose of maintaining existing infrastructure and no new structures are permitted. Maintenance activities are also subject to the submission of an annual work plan and approval. This process has been on-going since the BDNWR was established in 1990. However, from a utility reliability and maintenance perspective, the establishment of the BDNWR has not been without its challenges that were not anticipated 30 years ago. As infrastructure has aged, reliability standards have

changed and safe work methods for our crews have evolved. In recent years this has presented a challenge as there is no ability to add mid span structures to improve reliability or to enhance existing access to include bridges and culverts as these are classified as new structures. These restrictions were further evidenced during the construction of a new transmission line parallel to the existing transmission lines within the BDNWR. Existing roads and trails within the reserve were not permitted to be utilized for any purpose other than the maintenance of the existing line and subsequently had to be removed from the BDNWR through the legislative process in order to be utilized for the construction of the new transmission line.

Within the draft proposal we have identified two areas of overlap with our infrastructure as follows:

- Highlands of St. John's – This proposed area overlaps with the Labrador Island Link Transmission Line (LITL). The length of transmission line within the proposed boundary is 12.5 km and includes 47 transmission towers. There are also approximately eight (8) structures on transmission line TL 241 located within the proposed reserve boundaries.
- Stoney Lake – There are approximately 28 structures on transmission line TL 204/231 located within the proposed reserve boundaries.

In addition to the direct overlap noted above, two other transmission lines (TL 209 and 215) are located along the border of the proposed areas for Bras Mort Bog and Eastern Tolt respectively. An additional area of transmission line TL 241 is also adjacent to the proposed Highlands of St. John's reserve and in some areas the proposed boundary overlaps with the transmission line right-of way. The proposed Rodney Pond reserve also borders the LITL. These boundaries will need to be delineated.

Given the expectations of the long-term establishments of these areas as a legacy to future generations it is anticipated that reliability and maintenance requirements for our electricity infrastructure will continue to evolve and change. This must especially be considered in light of climate change and the associated need for adaptation and changes to requirements for infrastructure resilience. In addition, it should be taken under consideration that these areas are not representative of the pristine and natural areas that are intended to be protected by this proposal. As such, Nalcor is requesting that where existing infrastructure (including access trails, bridges and culverts) is located within proposed reserves boundaries that they be excluded from any proposed areas

should they be established. Nalcor is also requesting that a 50 m buffer be established around its existing electricity infrastructure. Where proposed areas border existing infrastructure this boundary should be delineated and a 50 m buffer should be established between the boundary of the proposed area and Nalcor's and NLH's right-of-way.

Nalcor and NLH expresses their appreciation for the opportunity to provide input into the process of the establishment of protected areas and welcomes the opportunity for further dialogue and discussion with WERAC.

Regards

Marion Organ

Marion Organ, M.Eng, P.Eng, PMP
Senior Manager of Environment and Sustainability
Nalcor Energy

Cc: Rod Healey, Environmental Services Manager, NLH
Walter Parsons, Vice-President of Transmission and Community Affairs, Power Supply

September 28th, 2020

To: werac@gov.nl.ca

From: Sean McGrath, Co-Director, *For a New Earth*

Re: The Wilderness and Ecological Reserves Advisory Council (WERAC)'s proposal "A Home for Nature: Protected Area Plan for the Island of Newfoundland"

As co-director of NL ENGO, For a New Earth (FANE, www.foranewearth.org), I am pleased to voice our organisation's full support for The Wilderness and Ecological Reserves Advisory Council (WERAC)'s proposal "A Home for Nature: Protected Area Plan for the Island of Newfoundland." Founded in 2015 by a group of professors and graduate students at Memorial University, FANE has been actively promoting greater environmental awareness in the province and a more aggressive public approach to protecting the wild places of our province. In the fall of 2015, we gathered over 80 scientists, ecologists, community leaders and students in Gros Morne National Park to discuss the future of that place, and the future of nature in our province in general. More, recently we convened the conference on "The Future of Oceans" at Memorial's Signal Hill campus (March 2019), which brought together ocean researchers from a variety of disciplines to discuss NL's responsibility for the health and fertility of the North Atlantic. We sent the results of our conference to Government and published them as a white paper, "Stewarding the North Atlantic." This document as well as information on all of FANE's activities can be found on our website.

WERAC's plan is long overdue. The Natural Areas Systems Plan was proposed twenty years ago, and we are only now getting to policy. FANE is deeply concerned about the threats to the wild places of this province, particularly from industry, and are distressed to see how little of NL is protected. WERAC's plan is in fact too modest in our view. The province currently protects 6.9 per cent of its land. WERAC recommends that that be increased to 8.7 per cent. This is far below what is needed. Given the uniqueness and fragility of the eco-systems in our province, we should be protecting as much as BC (19.5%). WERAC is proposing the bare minimum which should be done, and it should be implemented immediately, and indeed expanded in years to come.

And while it is crucial to protect the land, marine protected areas, only marginally included in the proposal, are just as important, as NL's premier ecologist, Dr. Bill Montevecchi has been arguing for years. See "Stewarding the North Atlantic," cited above.

Some might think that the province cannot afford to protect so much land in the light of its dire economic circumstances, FANE believes exactly the opposite is true. Precisely because of the economic pressure to develop our resources in the year's to come to pay down our debt and offset our deficit, we need WERAC's plan to be implemented quickly and without alteration.



Perhaps the most immediately relevant reason for expanding the area of protected NL: climate change. The importance of boreal forests as carbon sinks for greenhouse gasses is widely known. Given NL's Government's commitment to a 30 percent reduction of greenhouse gas emissions in the next ten years, moving toward the international goal of net zero by 2050, agreed by over 17 countries at the signing of the 2015 Paris Agreement (Canada among them), it is imperative that NL begin to protect more of its land as part of its commitment to helping Canada meet its emissions reductions goal. We may not be able to afford to decarbonize NL in the next few years; but we could go some way to offset our carbon footprint by offering Canada a larger area of protected boreal forest as a carbon sink for greenhouse gases.

These are practical and utilitarian arguments for protecting more of NL. Ultimately, however, FANE believes that it is our duty as Newfoundlanders and Labradorians to protect large areas of wild Newfoundland and Labrador for generations to come. We should do it because it is the right thing to do.

Sean McGrath



Miawpukek Mi'kamawey Mawi'omi

Council of the Conne River Micmacs

Government of the Conne River Micmacs

Conne River, Micmac Territory, Nfld.

A0H 1J0

(709) 882-2470

Fax (709) 882-2292

July 28, 2020

RECEIVED

AUG 17 2020

**Land Management Division
Corner Brook, NL**

Wilderness and Ecological Reserves Advisory Council
Natural Areas Section, Land Management Division
Department of Fisheries and Land Resources
P.O. Box 2006, Corner Brook, NL
A2H 6J8

Dear WERAC:

Miawpukek First Nation (MFN) is pleased to provide comment for the public review process for the "Protected Areas Plan for the Island of Newfoundland".

The MFN Traditional Territory is 2.5 million hectares in size and covers approximately one-quarter of the Island of Newfoundland. It occurs within the boreal forest zone and includes entire watersheds and several hundreds of kilometres of wilderness coastline. These lands have sustained the indigenous people of Miawpukek First Nation since time of immemorial. Mother earth has provided food, and medicines, shelter and all of the materials indigenous people needed for our traditional livelihoods. We need these lands for our survival and for our way-of-life.

Our traditional territory includes the significant majority of large intact forest landscapes remaining on the Island of Newfoundland, including entire watersheds from headwater to the ocean. These lands contain the largest remaining populations of Newfoundland caribou, and support numerous other species-at-risk, including the Newfoundland marten and boreal felt lichen. Our traditional traplines across our traditional territory and indigenous people are the holders of the traditional knowledge of these lands. We are determined to ensure that our traditional lands are protected indigenous-led.

MFN is pleased to undertake Indigenous-led conservation within our traditional territory. This work includes gathering traditional knowledge to identify, and establish, a network of Indigenous protected areas (IPAs). Our goal is to maintain the ecological integrity of the entire traditional territory and to ensure that these lands can continue

to provide for our people. Through this work, we are gathering traditional knowledge from our elders and from sending teams onto the land to document the conservation values that occur there. This particular project has been underway for over nearly 10 years, and we are very close to identifying the areas that we would like to see protected within our FMA with the province of NL. These areas will be declared IPAs. The federal government is providing funding to support this work, as an important initiative for Canada to achieve its protected areas targets. MFN has also had constructive conversations with the provincial government recently, regarding the management of lands within our traditional territory.

When the protected areas plan for the Island of Newfoundland was publicly-released back in May, the indigenous community were surprised that they were not consulted beforehand. Indigenous people are the protectors of this land and we should have been involved in identifying sites within our traditional territory. MFN has undertaken considerable work over the past 10 years to identify protected areas, and the government is fully aware of this, so we are wondering why this plan was rolled out without our input and support. Three proposed protected areas occur within our traditional territory; 1) Stony Lake, 2) Conne River North, and 3) Facheaux Bay.

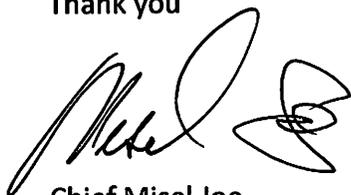
Although we support the protection of these places in principle, the sites that are currently proposed are too small, and too isolated. They don't identify the connection of Indigenous peoples to these lands, nor our way of life. We look forward to working with WERAC and the Newfoundland and Labrador government on improving the proposed protected areas within our traditional territory and ensuring direct involvement by MFN in these decisions.

Going forward, we expect the following:

- 1) Direct participation in the identification and establishment of protected areas with the MFN traditional territory
- 2) Inclusion of Indigenous protected areas (IPAs) within the protected areas plan for the Island of Newfoundland, in principle and also specific sites
- 3) Support for on-going co-management of protected areas for sites established within the MFN traditional territory.
- 4) To be indigenous-led on the protected areas.

We look forward to continuing this discussion.

Thank you

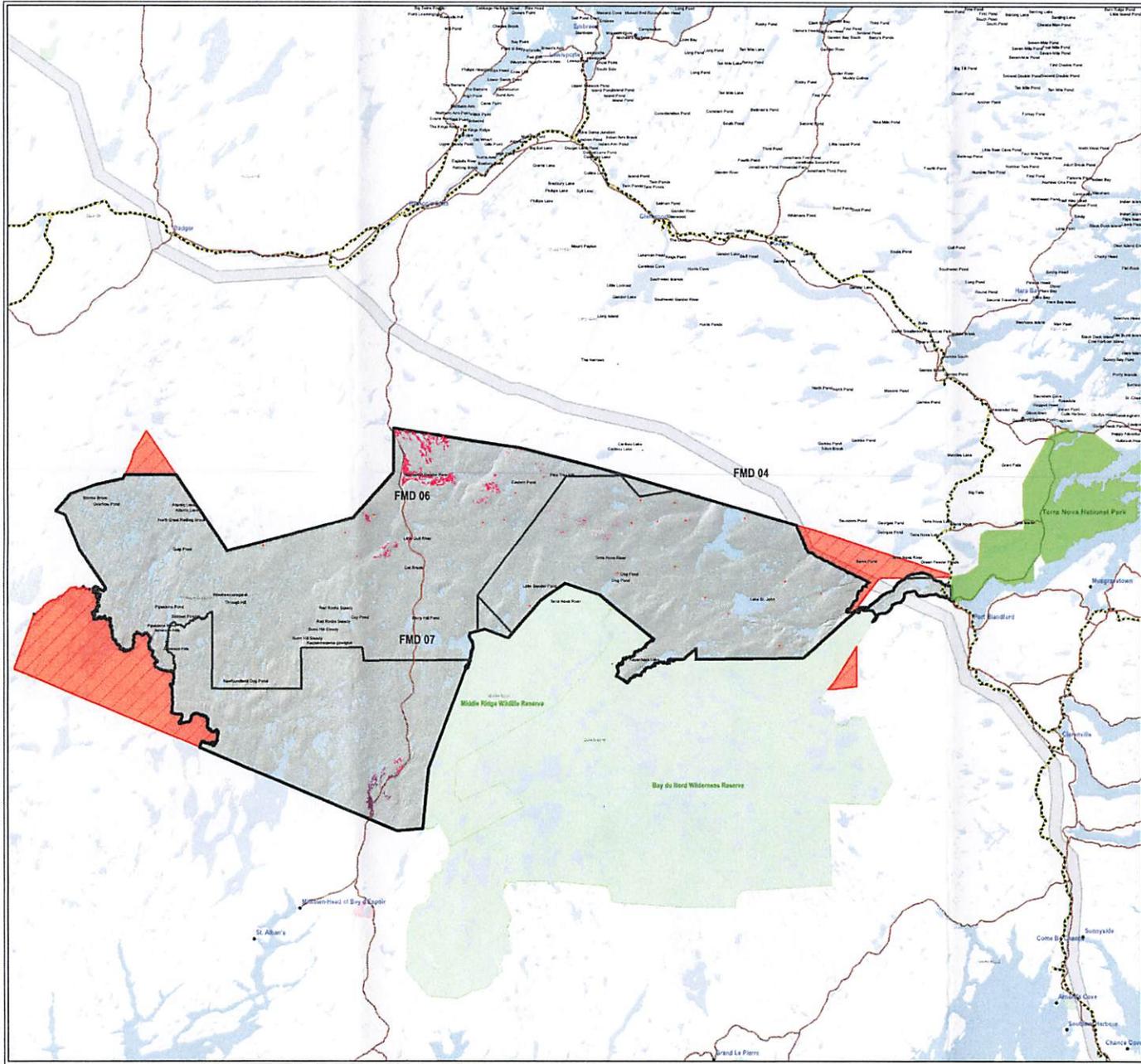
A handwritten signature in black ink, appearing to read 'Misel Joe', with a stylized flourish at the end.

Chief Misel Joe

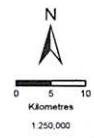
DRAFT
Crown Proposed
FMA Boundary
for Internal Review
August 06, 2020



Department of Fisheries & Land Resources
 Forestry & Wildlife Division
 REGIONAL SERVICES



- T-Railway
- Highway
- Transmission Corridor
- Crown Proposed Boundary August 06, 2020
- Original Boundary From MFN
- Jipujjuel Koozem Provincial Park
- Wilderness Reserve
- Terra Nova Park
- Permanent Sample Plots
- Silviculture
- Planting
- PCT



APR 18 2012

Miawpukek Mi'kamawey Mawi'omi
Government of the Conne River Mi'kmaw
P. O. Box 10
Conne River, NL
A0H 1J0

Dear Saqamaw Misel Joe:

I write pursuant to your recent request that land be designated to ensure that no future structural encroachments will affect future ceremonials and teachings and the eagle burial site for Miawpukek.

Understanding the importance of a protected area for the Conne River Mi'kmaw people, I am pleased to inform you that I have signed Directive Orders 239-11-C and 240-11-C which prevents the acceptance and approval of commercial resource based cabins, recreational cottages, and consumptive and non-consumptive lodges in the defined areas.

Sincerely,



TERRY FRENCH, MHA
Conception Bay South
Minister

cc Honourable Nick McGrath, Minister of Intergovernmental and Aboriginal Affairs
Secretariat
Ms. Tracey Perry, MHA, Fortune Bay – Cape La Hune
Mr. Darren Moore, Director of Land Management (A)



proposal protected area (Latitude 48.0016 Longitude -55.4898)

latitude 47.9974 Longitude -55.4946

chief old cabin

chief cabin



Proposal protected area (Latitude 47.9789 Longitude -55.5163)

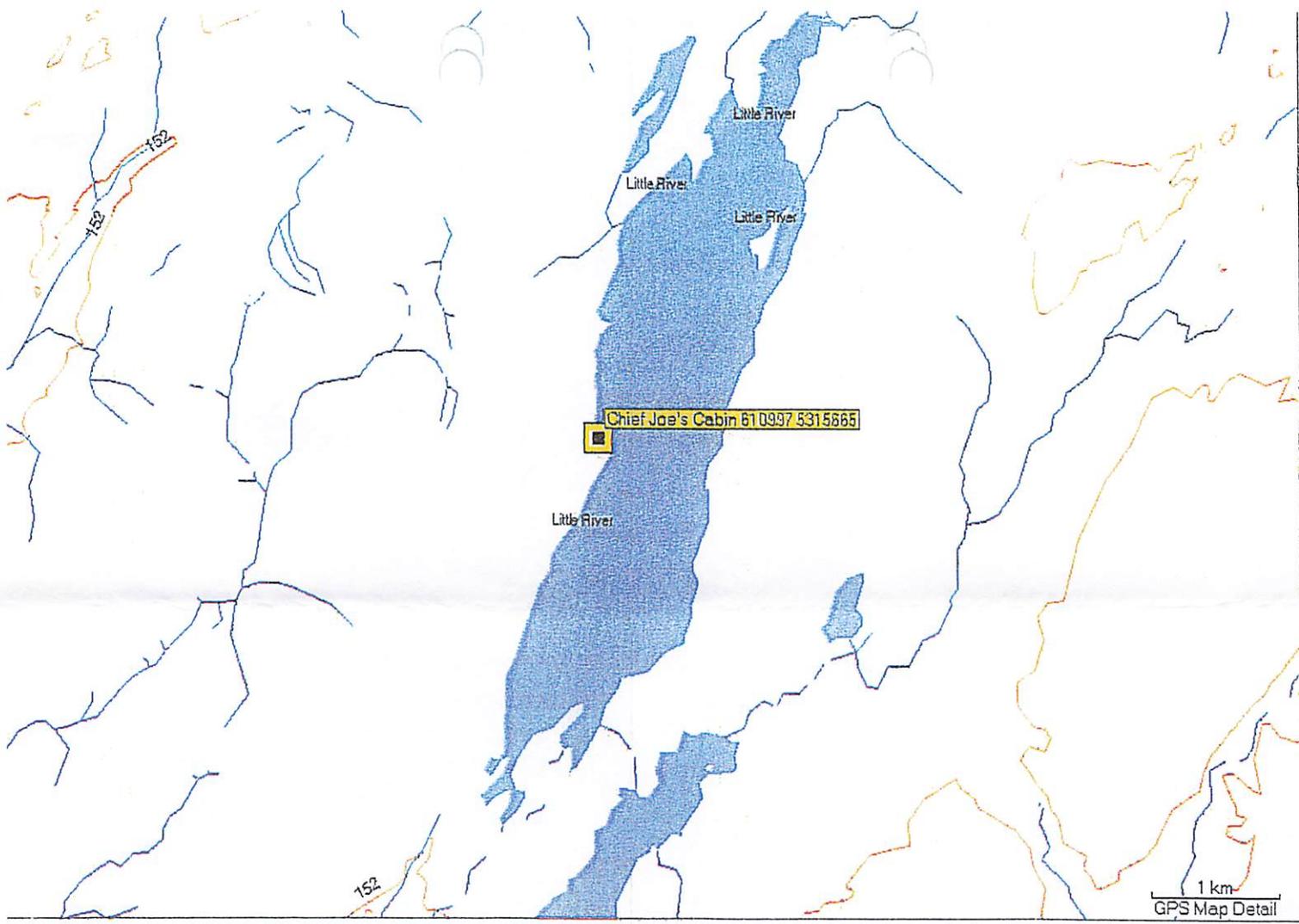
1931 m

© 2011 Cnes/Spot/Image
Data SIO, NOAA, U.S. Navy, NGA, GEBCO
© 2011 Google

© 2007 Go

612442.38 m E 5315478.74 m N elev 171 m

Streaming 100%





THE TOWN OF STEPHENVILLE CROSSING

P.O. BOX 68 STEPHENVILLE CROSSING, NEWFOUNDLAND A0N 2C0

TEL: (709) 646-2600 : FAX: (709) 646-2065

RECEIVED
July 3/20

June 8, 2020

WERAC Secretariat
Wilderness and Ecological Reserves Advisory Council
C/O WERAC Secretariat
Department of Fisheries and Land Resources
Natural Areas Section, Land Management Division
P.O. Box 2006
Corner Brook, NL A2H 6J8

Dear Sir or Madam:

We are writing this letter on behalf of the residents of Stephenville Crossing, to show our unified objection to the WERAC Protected Areas Plan. More specifically, to the proposed Ecological Reserve designation of the Bras Mort Bog which borders our community.

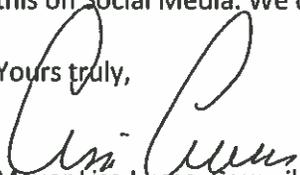
The Bras Mort Bog is already protected on the south and west sides by water. This area is accessible at best, for three months out of the year under three to four feet of snowpack. Resident cabin owners, woodcutters, and hunters use it in winter months. As I stated, it is accessible only in the winter months when the frozen water allows snowmobile access.

Domestic cutting occurs in the area but only to the south of the power line, which happens to be the southernmost boundary of the proposed reserve so the bog isn't impacted. There are cabins in the area, and have been for one hundred years, and our residents have been free to use this area when weather permits and we feel like our freedom is being taken away from this. This area was, and still is, used by our local indigenous group by boat and on foot, for foraging and collecting wild edibles and for ceremonial purposes.

The easterly portion of this proposed reserve runs to the Trans Canada Highway. This area is already off limits to All Terrain Vehicle traffic until it becomes frozen or under snowpack, and is protected under the Motorized Snow and All Terrain Vehicle Act. The only exception to the rule is for successful hunters to retrieve their big game animal, if and only if, a kill has been made and then the number of trips are restricted.

In closing, we feel that this area is already afforded the maximum amount of protection available. We are already restricted as to what we can do and we have learned to live with these restrictions, while at the same time leaving this natural area undisturbed for the most part. We feel this Ecological Reserve will do no good and cause a lot of mistrust between our residents and the Provincial Government and our Municipal Government. The amount of backlash that Council has already received is overwhelming, and we have to look out for the rights of our residents and future generations. We feel that this proposal was not well thought out and/or weighed against the protection measures already in place. We feel that a little consultation up front in the first place, would have ended this before everyone had a chance to wake up and see this on Social Media. We cannot, and will not, support this in any way.

Yours truly,


Mayor Lisa Lucas, Council, and residents
Town of Stephenville Crossing

PC. Scott Reid, MHA, St. George's-Humber
Gerry Byrne, Minister, Fisheries and Land Resources



Newfoundland
& Labrador
Wildlife
Federation

Policy Review Document – October 01,2020

**The Wilderness and Ecological Reserves
Advisory Council – A Home for Nature:
Protected Areas Plan for the Island of
Newfoundland - NLWF Submission.**

To WERAC,

This is NLWF's review of the Wilderness and Ecological Reserves Advisory Council's proposed "A Home for Nature: Protected Areas Plan for the Island of Newfoundland". This plan has been the subject of a variety of public input in which we have learned over the past few months from a wide range of people across Newfoundland and Labrador.

We fully recognize the importance of ensuring the provinces wildlife and ecosystems are protected for all people. However, if this plan is to be accepted from the public, we believe there must be a fundamental understanding of the cultural, traditional, and heritage activities in Newfoundland and Labrador. The United Nations Convention on Biological Diversity highlights the importance of people and food security. The province of NL has had a food security issue since the collapse of the cod fishery in 1992. The ability for residence of the province to hunt, fish, and forage for food on public crown land must be ensured for the residence of Newfoundland and Labrador.

In the document on page twelve under the goals section the third goal listed states "To protect cultural heritage and support traditional uses that complement protection". The use of "complement protection" must be reviewed and properly defined for the public to understand precisely what it means in legal terms. The context surrounding this text is ambiguous and in order to safeguard culture, traditions, and heritage activities this section should be re-examined.

The list of activities in the referred document highlights eleven activities for review for each proposed zone. We have listed below a simple yes and no response to each, recognizing that certain small ecological places within each zone could be considered for exceptions due to unique, rare, important wildlife and ecosystems.

- Hunting and Fishing – Yes
- Berry picking and Mushroom picking – Yes
- Camping – Yes
- Boil-ups and Campfires – Yes
- Cutting Firewood – Yes
- Cabins – Yes – However, no further development of land.
- Outfitting – Yes
- Motorized Vehicles - No
- Snowmobiling – Yes
- Boating – Yes
- ATV – No – Only exception if used to retrieve a hunted animal.

Yours in Conservation,

Andrew Bouzan, President,

Newfoundland and Labrador Wildlife Federation.

Atlantic Canada Executive Committee
Sierra Club Canada Foundation

September 29, 2020

WERAC Secretariat

Wilderness and Ecological Reserves Advisory Council
Department of Fisheries and Land Resources
Natural Areas Section, Land Management Division
Corner Brook, NL

Dear WERAC Secretariat,

On behalf of the Executive Committee of the Sierra Club Canada Foundation – Atlantic Canada Chapter, I am writing to offer our support for the proposed plan, *A Home for Nature: Protected Areas Plan for the Island of Newfoundland*.

The province of Newfoundland and Labrador has lagged behind in establishing protected areas, currently protecting only 6.9% of the province and falling among the three least protected provinces in Canada. Newfoundland and Labrador is not doing its part to support the Pathway to Canada Target 1 to protect 17% of Canada's land and freshwater by the end of this year. Now is the time to take action for nature, and the first phase of this proposed plan will safeguard Newfoundland's wild spaces for all residents and tourists to continue to explore and enjoy.

The proposed plan offers many strengths: providing ample opportunities for Newfoundlanders and local users to participate in the development and management of protected areas; being sensitive to the important cultural uses of wild spaces in Newfoundland; giving interim protection to the proposed areas while consultation proceeds; and, importantly, increasing protected area coverage on the Island from 6.7% to 12.5% for all to enjoy into the future.

We also offer our criticisms on the concept of Transitional Reserves. While we can see that this was an effort to balance economic and environmental interests, we are concerned that some of these spaces are directly adjacent to other proposed protected areas (see, for example, Mare Coe, Barachois South, and Gambo Pond). We caution that, should significant mineral or petroleum discoveries be made in these Reserves, development is likely to hinder the ability of protected areas to meet their conservation objectives. We urge WERAC to consider these potentially harmful impacts in the next iteration of this plan, ensuring that all proposed areas can offer significant conservation value to the province.

Together we are responsible for the stewardship of our local species, habitats, and ecosystems. With the implementation of the proposed protected areas, we are excited to see Newfoundland and Labrador emerge as a leader in conservation action in Atlantic Canada.

Sincerely,



Julie Reimer

Regional Director Atlantic Canada – Sierra Club Canada Foundation
PhD Candidate, Memorial University of Newfoundland



Tuckamore Lodge Ltd. • P.O. Box 100 • Main Brook • NL • Canada • A0K 3N0

September 14, 2020

WERAC Secretariat
Wilderness & Ecological Advisory Council
c/o WERAC Secretariat
Dept. of Fisheries & Land Resource
Natural Areas Section
Land Management Division
P.O. Box 2006
Corner Brook, NL
A2H 6J8

Dear Erica Pittman:

Thank you for your recent calls, I am responding to the document that is presently being deal with in the Public Forum of the Province.

I have concerns about the increase of the Islands of Hare Bay that are to be included in the Ecological Reserve. The Three (3) new Island outlined in your document I do not agree with. I will not support the inclusion of Bique Island, locally known as Apron Island or Maria Island known locally as Nancy's Island and I doubt if many in Main Brook would think any differently. It is an island that is used a considerable amount for berry picking and picnicking of big groups. Apron is used for boil ups and Gooseberry picking.

As for the Spring Island in my opinion you are welcome to include that into the new plan, but I am only speaking for myself.

Barb Genge — Owner

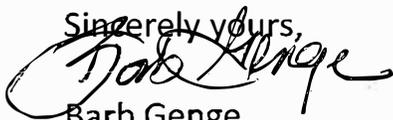
Boiling Brooks Protected Area- the local people who have cut wood all of their lives from the area have been prevented from doing so but I see in the past couple of years they are like thieves in the night. Forestry officials go home and the action begins. It is filled with dead wood from a hurricane that went through here a few years ago. We had asked **Redacted** if we were allowed to remove dead and fallen trees and the answer was NO so try telling people they can be accommodated now is a loss cause. If we could have obtain cleaning up the area you would have support for what you are asking but that denial was the clincher for all of the locals. It is said that they will tell you anything to get what they wants. It is too bad that we couldn't have accomplished the only one (1) request we had ever made so that has set the guideline for disapproval of any more for the reserves.

The areas that have selected for the Peninsula are by far too large and we have one Gros Morne on the Peninsula and we don't need another one. We need development more than anything and the fight will be hard and bitter and the people will not take it this time. Too much was taken to meet the Nfld. & Labrador quota for Canada under the Eco Green Economy and the Great Northern Peninsula will not be the savour this time for the rest of Newfoundland & Labrador.

We need protected areas but going too far is just going too far. I really feel that the time has come to have Public Meeting during the Consultation Period and if the people don't get public meeting to be able to ask question you will find it hard to get people to change their minds but you will never get acceptance of what was presented in the book A Home for Nature.

Thank you for reading what I have written and I will be at the meeting when it takes place in Main Brook.

Sincerely yours,



Barb Genge



Tree of Life Sustainability Project Inc.

709-765-6271

220 Main Road
P.O. Box 132, Site 3
St. Catherines, NL, Canada
A0B 2M0

Wilderness and Ecological Reserve Council
Government of Newfoundland and Labrador

September 26, 2020

Dear WERAC

Re: Submission on the NL Protected Areas Plan

Please accept this submission for consideration and integration into the Protected Areas Plan (PAP) recently released by your Government. I congratulate WERAC and Government for finally releasing a plan for further protection of our natural areas in NL. This initiative is very badly overdue (~ 20 to 30 years) and some of the difficulties that I identify in this submission are a result of the complacency of successive Governments and bureaucrats.

I am a long term resident of the Salmonier, St. Mary's Bay area, and have spent my life hiking, hunting, and fishing throughout the central Avalon Forest. At 66 years of age I qualify as an elder who can speak to local traditional knowledge that in some cases is lacking in your management agencies. I have a Ph.D. in wildlife ecology and considerable expertise in forest ecology. Over the past 15 years I have conducted extensive research and monitoring of globally endangered lichens particularly in the central Avalon forest. As Science Adviser to the Newfoundland Lichen Education and Research Group (NLERG), I was part of the field team that discovered the concentrations of rare and ultra-rare lichens in the area of Hall's Gullies (an approved clear-cut at that time) identified in your PAP. I was part of the Newfoundland Working Group (NWG) of the Canadian Boreal Forest Agreement (CBFA) that undertook a province-wide conservation gap analysis (unfortunately it didn't include the Avalon), and therefore I have a broad knowledge of the conservation needs and optimal areas on the Island of Newfoundland.

My submission has a decided focus on the Avalon Forest Ecoregion for a number of reasons, including:

1. It is an unusually small yet notably unique ecoregion that lacks representative protection.
2. It is the closest forested ecoregion to the capital city and surrounding areas, and there are considerable development pressures and human related disturbances, most notably cottages and unregulated All Terrain Vehicle (ATV) use.

3. The core area continues to be the focus of industrial forestry proposals, and much of the ecoregion has already suffered from excessive clear-cutting. Most of the area is blanketed by a Minute in Council (2006) M.C. 109-83 designating it a Cottage Planning Area. In essence, some of the most threatening activities originate inside your own government.
4. During the period when Dr. Hermanutz was Co-chair of WERAC, I made a presentation to the council supporting that the Avalon Forest Ecoregion was an endangered ecoregion. This situation has worsened over the past two decades.
5. Over the past few decades, illegal cottages have proliferated in the proposed Ripple Pond Reserve area, and associated ATV damage is considerable. The lack of enforcement of illegal occupancy and the blanketing of the area as a cottage development area have accelerated this and associated human disturbance in this area. I expect it will create a lot of resistances and problems to the establishment of these critically important ecological reserves.
6. Environmental Non-Government Organizations have repeatedly requested the minister responsible for forestry to provide special designation for the areas of intact landscape in the interior Avalon forest. As recently as 15May2020 Minister Byrne had considered the designation of the Bad Pond area as a Dynamic Species Specific Area (DSSA) under the new Sustainable Forest Management Strategy.

Ecological Principles

I am integrating the following ecological principles in support of recommending the size and configuration of the Avalon Forest Reserve, these include:

1. Increasing the size of the reserve ($\geq 100 \text{ km}^2$) and minimizing edge effects by enlarging interior area while favouring an overall circular polygon shape.
2. Prioritizing inclusion of intact landscape (minimal human footprint) as this includes old-growth forests with maximum biodiversity, notably globally endangered lichens.
3. Managing to retain intact habitat for umbrella species, namely woodland caribou, that historically occupied remote sections of this ecoregion.
4. Recognizing that certain portions of an optimal reserve may need ecological restoration.

Recommendations

1. The proposed Ripple Pond Ecological Reserve and the Hall's Gullies Ecological Reserve be merged by including the intervening area. This would ensure gene flow between the two areas. This intervening area is disturbed and will require some future ecological restoration.
2. The overall Avalon Forest Reserve be expanded north and east to include intact landscape (low human footprint) thereby enlarging the reserve to its original proposed size of approximately 100 km^2 or larger (see Fig. 1).
3. The overall Avalon Forest Reserve be expanded east to include intact landscape (low human footprint) that is part of the historical range of the Avalon woodland caribou herd (Fig. 1).

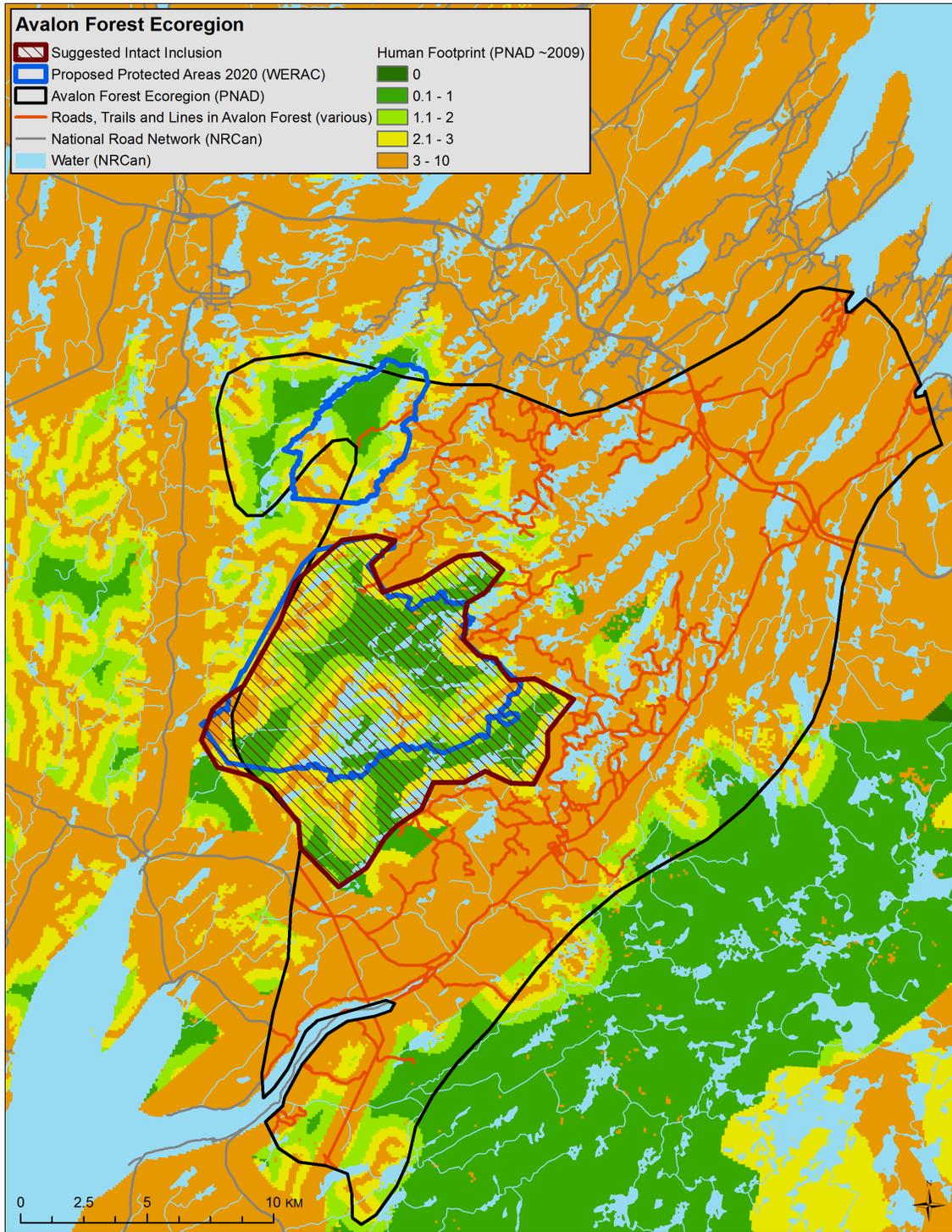


Figure 1. Avalon Forest Ecoregion and human footprint delineating suggested included intact landscape.

Further Justification

The CBFA was an important step in conservation of boreal forest in Canada. Its guiding principles were formulated based on critical habitat needs of woodland

caribou which are 'at risk' and have been in long-term decline across Canada. The protection of intact landscape is vital to maintaining viable populations because there remains no scientific evidence that woodland caribou will occupy a post-industrial forest landscape. Maintenance of intact landscape ensures that our native caribou continue to roam our interior forests and bogs.

The Avalon caribou herd was once regarded as supporting some of the largest and most magnificent stags in the world. The herd was almost extirpated by unregulated hunting by the early 1960's when it reached an historic low of 65 animals. Elders (e.g. Jack Hender and Daniel Walsh) commonly made reference to caribou historically occupying the area of Bad Pond in the central Avalon Forest as well as the Salmonier River valley. Through focused enforcement and management the herd recovered and reached a peak abundance by the mid 1990's speculated at close to 10,000 animals. The Avalon herd crashed to about 500 animals in the late 1990's due to an outbreak of brain worm but continues to recover in a cyclic manner typical for caribou. While most of the caribou herd roams the Avalon Wilderness Reserve and surrounding area, it also historically occupied the central intact areas of the Avalon Forest Ecoregion, particularly in the area of Colinet Bad Pond and Hender's Bad Pond where there is a mosaic of forest and extensive raised bogs. By the mid 1980's, as densities increased, the Avalon herd reoccupied this former range. Suitable intact landscape remains in this core area. It remains uncertain as to whether the herd is still occupying this area, although it was last confirmed by the Wildlife Division to be there in 2006. By managing for intact habitat for woodland caribou we are effectively protecting the viability of the forest ecosystem.

The Government of Newfoundland and Labrador completely lacks any management plans for our herds of indigenous caribou. A relatively recent \$15.3 million program failed to produce any management guidelines for herds, and define any priorities for habitat conservation for herd management. In effect, management is ad hoc, and critical scientific data and anecdotal information are now lost. Protection of intact habitat for woodland caribou will ensure a continued supply of old-growth boreal rainforest that is the critical habitat for endemic biota as typified by the globally rare cyanolichens. A large and robust ecological reserve is vital for the central Avalon Forest.

Final Comments

There are a number of proposed protected areas in the PAP that I am very pleased to see, most notably, the Cloud River Tickles, expansion of Hare Bay Islands, Boiling Brooks, Gambo Pond and Rodney Pond. I lack familiarity with some of the areas proposed, and in other cases my experience with CBFA supported the existence of very important intact landscape areas that do not seem to be incorporated, most notably in Bay d'Espoir area and integral to the traditional territory of the Miawpekek First Nations (MFN). We had also identified Serpentine Lake, once a proposed national park, and a spectacular area needing better conservation. I would recommend prioritizing protection of stands of the native white pine because it was once a dominant forest species but has diminished rapidly and there is little or no management attention to ecosystem restoration. I recognize that some of these

areas are affected by long-term timber tenures held by corporate interests but the CBFA experience suggests these interests can help in achieving conservation targets.

Considerations for Ministers and Bureaucrats

REDACTED

Increasing our protected area network is vital because Newfoundland is still blessed with an expanse of natural landscapes during a time when worldwide many natural areas, such as the Amazon Rainforest, are disappearing rapidly. The vision to protect our natural heritage is a high vision that is looking beyond today to what we are doing and leaving for our children's children. By understanding this, our minister(s) and their supporting staff are leaving a legacy that ultimately benefits everyone. Ultimately it goes beyond our province, and contributes to the entire earth by helping to mitigate climate change and ensuring natural areas remain in perpetuity.

Sincerely,



Ian Goudie, Ph.D.



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September 29, 2020

WERAC Secretariat – Wilderness and Ecological Reserves Advisory Council
Department of Fisheries, Forestry and Agriculture
Natural Areas Section, Land Management Division
PO Box 2006
Corner Brook, NL
A2H 6J8

Re : A Home for Nature : Protected Areas for the Island of Newfoundland

WERAC Secretariat Members :

Sexton Lumber Co. Limited would like to thank you for the opportunity to comment on "A Home for Nature : Protected Areas for the Island of Newfoundland".

The origins of Sexton Lumber date back to the 1940's when George Sexton entered into the sawmilling industry. In continuing the family business George's son Kevin and wife Susan Sexton are committed to the operation of a sustainable business for themselves, their employees, their customers and the renewable natural resource that make their rural business venture possible. Since its inception Sexton Lumber has continued to expand and modernize its operation. Today it is the largest sawmill in Newfoundland and Labrador manufacturing in excess of two-thirds of all lumber production. The company's lumber production complex is unparalleled in this province and our modern optimization technology compares favorably to any mainland mills.

The company operates on a year-round basis corporately employing 104 direct employees, with an annual payroll of \$6,700,000, within rural Newfoundland. The employment figure does not include the over two dozen log trucks that work exclusively hauling wood from our harvesting limits. Nor does it include the employees working for the crown harvesting operations that are harvesting logs exclusively for Sexton Lumber.

In addition to traditional lumber production, the company has diversified its product selection to open new market opportunities by adding a finger jointing line to produce random length lumber and a pressure treating plant. To our knowledge Sexton Lumber is the only mill in Canada producing finger jointed structural lumber manufactured to the National Lumber Grades Authority (NLGA), Special Products Standard 1 (SPS-1).

Sexton's lumber is sold in Newfoundland, Atlantic Canada, Quebec, Ontario and the United States. Under Kevin and Susan's leadership the company has invested over \$30,000,000 into the operations. This year Sexton Lumber will produce 70,000,000 Foot Board Measure (FBM) of lumber and generate revenues of over \$35,000,000.

"A Home for Nature" is a well meaning plan that hits many of the right notes. We are fully supportive of protection of our natural environment. In fact, our industry relies on sustainable forest management. However, we do have some issue with several of the areas that have been identified.

In our review of your Protected Areas Plan we are concerned with the selections of Area 21 - Rodney Pond, Area 22 - Gambo Pond, and Area 32 Gambo Pond (Transitional Area). These areas are very important to the long-term sustainability of Sexton Lumber.

In the document's "Minimize Resource Conflict" section, in selecting areas "A top priority has been to select areas with few roads and industrial impacts...". The inclusion of Rodney Pond (Area 21) and Gambo Pond (Area 22 & 32) is not consistent with this stated goal.

The Rodney Pond area has been a traditional logging area. Over the years it has been the base for harvesting activities conducted by Abitibi, Kruger, and crown operators. There is an extensive network of resource roads within this area. We believe that the road network is somewhat greater than that which is illustrated in the document. Further to this, the established road network that passes through the proposed protected area is required for access to areas that are outside of the proposed protected area. The sizeable permanent footprint of the road infrastructure is difficult to reconcile with the stated goal of "selecting areas with few roads".

Also included under the "Minimize Resource Conflict" section, "Another key consideration that government made in selecting areas was that the areas impose minimal impact to resource-based industries." Including Rodney Pond (21) and Gambo Pond (22 & 32) in the Protected Areas is in direct conflict with this goal.

These three areas cover a significant portion of the forest land base in Forest Management District's (FMD) 4, 5, and 6. Sexton Lumber holds combined annual timber harvesting permits totalling 39,000 m³ in FMD 4,5, and 6. This represents over 18% of our timber allocation. It also represents the closest, and the most economically advantageous, wood for the mill. Sexton Lumber has previously harvested within, and adjacent to, the proposed Rodney Pond block, and is currently harvesting in the Chain Pond, Maccles Lake, Rocky Pond area which is adjacent to the proposed Gambo Pond area. The potential loss of this productive forest land base is an economic threat that could jeopardize plant operations and employment levels. It would almost certainly force a hold to any expansion plans.

In a larger scope, we question why the land base represented by the Rodney Pond and Gambo Pond areas need to be included in the proposed protected area plan. The Central region already contains three of the largest protected areas in the province, Terra Nova National Park, Bay Du Nord Wilderness Reserve, and Middle Ridge Wildlife Reserve. Excluding these areas would not have a significant impact on the Central region's

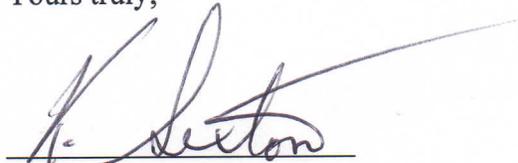
contribution to the protected areas plan. If the area does need to be replaced there must be other areas available that do not carry the same level of land base conflict.

The province is at an economic tipping point. The downturn in the oil industry, the excessive debt burden and the impacts of Covid-19 have pushed our fragile economy near to collapse and the province near to insolvency. Now more than ever existing industry needs to be protected, supported, and encouraged. It is not the time to create new economic challenges.

Sexton Lumber is requesting that WERAC remove Area 21 – Rodney Pond, Area 22 Gambo Pond, and Area 32 Gambo Pond from the proposed Protected Area Plan.

Thank you for your consideration.

Yours truly,

A handwritten signature in blue ink, appearing to read 'K. Sexton', is written over a horizontal line.

Kevin Sexton
President

Cc Premier Andrew Furey
Hon Elvis Loveless, Minister of Fisheries, Forestry and Agriculture
Hon. Siobhan Coady, Minister of Finance
Hon. Andrew Parsons, Minister of Industry, Energy, and Technology
Hon. Craig Pardy, MHA Bonavista South
Stephen Balsom, ADM – Forestry
Bill Dawson, Newfoundland and Labrador Forest Industry Association

Paul Garland Forest Products Ltd

P.O.Box 399

Harbour Grace, NL

A0A 2M0

June 05th 2020

To Whom It May Concern:

Once again, here we are, being brought into an unnecessary fold asking for help and clarification on an issue that should have been put to bed years ago.

Let me start by saying who we are. We are the people whose livelihood is being thrown up in the air for someone with no firsthand experience in what they are making decisions on. We are a logging, sawmilling, value added operation, and in essence, one of the biggest environmental operations on the island. Paul Garland Forest Products Ltd has been in the logging/sawmill industry for 45+ years and has a family history in the foresting industry for 150 years. PGFP has put approximately \$80 million NEW dollars back into the provincial economy and has hired hundreds of people and still employs 25+ people a year. Why is it that when our traditional cutting areas are being put into question, the experienced hands on people are not the main players and informers? Instead, decisions are being made by “educated” people. I guess books can replace experience. I guess the educated decisions have well been documented for their success. NOT!!!

During the company’s years in the forest industry there have been ups and downs. It is when these downs are unnaturally caused by “educated” people that there is a problem. Just a refresher on how this happens here are a couple of examples. British Columbia tried to save their forests through what they thought were wonderful environmental ideas. Low and behold they have been destroying their forest and the evidence is everywhere with them trying to salvage what they can of their beautiful forest. The beetle bugs, fire and windfall have destroyed them. And let us not forget exploding sawmills due to saw over mature dry timbers. I always thought that dry timber was a process not meant to produce the lumber. Genius, I say, put dry wood through a hot metal blade and hope for the best. I guess the caveman wished that they had thought of a spark on wood to create fire. Oh, they did. Guess we never learned from that one? But that is BC. A wise industry person once said “ if you don’t respect the forest and Mother Nature, she will take care of it . She will burn it, disease it, or blow it down”. Pretty true words. In 1994, our province experienced the worst wind fall that can be remembered. Why you ask did this happen? The answer is quite simple, people who are so called educated groups interfered with the natural process of nature. The infinite wisdom of bureaucrats and self-serving, self-

proclaimed environmentalists decided they would try and save the forest, hug it if you will. Not allowing for harvesting, replantation, and regeneration. So instead bug infested over mature timber was left to fend for itself. So, Mother Nature did what she could to help herself. She blew it down. Now, everyone is faced with a problem. How in the heck do we clean it up so that it does not turn into a major forest fire? Well, there was this little company who had been grovelling and plead for wood to stay alive, so who better to give stipulated permission to but them. So that company went in and cleaned up YOUR mess. Heaven forbid that the wood could have been harvested when it was mature and then replanted. No instead the Avalon was turned into a recovery project to clean up and try and save the Central Avalon Forest. It really is too bad that there must be devastation in order to realize what benefits can come from good management and harmonized collaboration on things that are important.

Paul Garland Forest Products has been available from the beginning for stakeholders' meetings, operating plans, and environmental management input on the Avalon Peninsula. I am testament to 20 years of this as I have been to more than one late night fight at Lav Rock for stakeholders' meetings and more than one presentation before a committee and even Forestry officials including Ministers.

There is now a proposal in place for a 92km² "Central Avalon Wilderness Reserve". This is in one of the areas on the Island portion of Province that are and have been "Traditional Cutting Areas". Mr. Garland's family had been cutting on the Avalon, particularly the Central Avalon since the 1880's. Floating logs down the Collinet River and Rocky River to get them to the sawmill in Whitbourne and Harbour Grace. Guess what??? The forest regenerated and is still there. There should be some sort of Grand Father right given to Mr. Garland rather than to WERAC with their higher than thou ideologies of how the forest worked and continues to work. Ask experience. Ask turpentine covered hands and clothes. Ask the bad back and sleepless nights what should happen in the Central Avalon. These areas have been cut, replanted, harvested again, replanted and are ready as a mature forest to be cut again. But not on your watch! I can only reiterate repeatedly, as I have for the past 20 years, why do you need a "Wilderness Reserve" in the Central Avalon Traditional Cutting Areas? Currently the landmass on the Avalon Peninsula contains approximately 22% park space and reserves. This does not include the Salmonier Valley and the land that the Nature Conservatory has blocked out. Nor does it include the extra 21% in District 1 that falls under Watershed protection. Yet, the World Commission on Environment and Development for the UN, known as the Brundtland Commission recommended a National average of 12%. The Avalon Peninsula (District 1) has what seems to be ample nature parks, nature trails, municipal parks, private parks, and provincial parks. I am sure that there is more than enough biodiversity of the ecoregion to be represented, studied, and protected. To add more reserves is a shea abuse of power and lack of backbone on the government's part. There is a genuine lack of interest in the forest, nature, and the livelihoods that it provides. This is an area that is our breadbasket and provides a living for 25 employees at our site and spins off into the fishery and developmental markets as we supply pallets to most processing plants on the Island and Labrador. If this trend continues with the elimination of a viable timber resources, lumber markets and pallet markets will have to resort to the mainland Canada markets for supply. Which leads to higher prices for pallets and lumber as well as the employment in these markets squashed. This has happened in the past, but with access to the resource we have been able to supply the demand at a cheaper price and keep our "OWN"

employed not the Mainland's'. If there is some new biodiverse ecological discovery made then by all means protect it, study, it, and represent it. Can all these things not be done in a "Forest Reserve"? The only deforestation are cabins and parking lots (nicely put by Joannie Mitchell). A "Forest Reserve" ensures proper management and the interest in the welfare of all assets and attributes their in. A forest reserve allows for harvesting by commercial and domestic harvesters, replantation; it allows for recreational use; it allows for the maintenance and well being of the forest and all its inhabitants, as well as provide millions of "NEW" dollars to the economy. A "Wilderness Reserve" of such a proportion as 92km² in District 1 most of the province population already occupies the landmass is a devastation and a crime to nature and future generations.

They say that one should learn from their mistakes and lead in a new direction, not repeat repeatedly. Ignorance is no excuse for future devastation and heart ache. Once you have put this 92km² Wilderness Reserve in place the damage will be done to the future and will be irreversible. Another salvage and recovery project will have to start again. This time we may not be as lucky.

Do the right thing, listen to the true stakeholders, weigh out the pros and cons. Give equal consideration and time to a "Forest Reserve" with proper management as you have to a "Wilderness Reserve" on the Central Avalon. Look carefully at past mistakes and success. Weigh them out and heed their lessons. All can be accomplished with a well managed "Forest Reserve" with proper management and a diverse number of uses. Remember, it is not us that will suffer the consequences or reap the benefits, it is the future generations and that is what must be considered.

Looking forward to a healthy forest future for us and future generations. Do what is right!

Regards

Natasha Garland, B.A

Paul Garland Forest Products Ltd.



Wilderness and Ecological Reserves Advisory Council

c/o WERAC Secretariat
Department of Fisheries, Forestry and Agriculture
Natural Areas Section, Land Management Division
P.O. Box 2006
Corner Brook, NL
A2H 6J8

23 September 2020

To whom it may concern,

The Nature Conservancy of Canada (NCC) is excited to see the release of a draft protected areas plan for the island of Newfoundland and applaud the Wilderness and Ecological Reserves Advisory Council (WERAC) and the provincial government for taking this critical step forward.

Living in Newfoundland and Labrador we are used to having world-class natural wonders at our doorstep. The implementation of this protected areas plan will help ensure Newfoundlanders and Labradorians will always be able to enjoy our province's wilderness. Protected areas conserve diverse ecosystems and the species that depend on them. They also strengthen communities by supporting climate change adaptation, offering tourism and recreation opportunities, and providing ecosystem services like air and water filtration and flood mitigation. It's becoming increasingly clear that we can't afford to lose the benefits that natural spaces provide.

The importance of protected areas is why Canada has set the goal of conserving 25 per cent of its lands and oceans by 2025. We all have a key role to play to meet these conservation commitments. Increasing provincially protected areas in Newfoundland and Labrador is essential.

A recent report published by the Nature Conservancy of Canada and NatureServe Canada identified 27 hotspots of nationally endemic species, including three on the island of Newfoundland (Northern Peninsula, Southwest Newfoundland, and the Avalon Peninsula). This special group of wildlife is critical for maintaining biodiversity and, as Canada has the full responsibility to conserve these species, NCC sees the proposed reserves in these areas as a high priority. These include Cape St. George, Barachois South, Bras Mort Bog, St. Paul's Islets, Spirit Cove, Highlands of St. John, Cape Norman, Watts Point Extension, Halls Gullies, Ripple Pond, and St. Shotts.

The proposed Barachois South Reserve is also valuable for increasing the connectivity of existing protected areas, bringing together King George IV Ecological Reserve, Barachois Pond Provincial Park, and NCC's Barachois Brook Nature Reserve. Additionally, NCC's Grasses Nature Reserve is less than 4 km from the proposed boundary. We are living in a world where nature is becoming increasingly fragmented and large, connected landscapes are vital, not only for maintaining species resilience, but also for ensuring that Newfoundland and Labrador's natural heritage continues for generations to come.

We appreciate the opportunity to review the draft protected areas plan and are glad to see the provincial commitment to public consultation and engagement throughout the process. We also look forward to learning more about the province's plans for collaborative conservation in Labrador. The Nature Conservancy of Canada would be excited to explore opportunities for partnership with WERAC and the province in implementing the protected areas plan. Across the country, NCC has experience supporting provincial governments with protected areas, including here in Newfoundland and Labrador with the Burnt Cape, King George IV and Cape St. Mary's Ecological Reserves.

This protected areas plan is the start of an exciting new chapter for conservation in Newfoundland and Labrador and we strongly encourage the province to move forward with its implementation.

Sincerely,

A handwritten signature in black ink that reads "Megan Lafferty". The signature is written in a cursive, flowing style.

Megan Lafferty
Program Director, Newfoundland and Labrador

cc
The Honourable Elvis Loveless – Minister, Fisheries, Forestry and Agriculture
Tracy King – Deputy Minister, Fisheries, Forestry and Agriculture



Newfoundland & Labrador Prospectors Association

17 Nelder Drive * Mount Pearl * NL * A1N 4M2
709-740-6000 nmerc@nlprospectors.org

June 30, 2020

Mr. Graham Wood
Chair of WERAC, WERAC Secretariat
NL Dept of Fisheries and Land Resources
Natural Areas Section, Land Management Branch
P O Box 2006, Corner Brook, NL., Canada
A2H 6J8

RECEIVED

JUL 10 2020

Land Management Division
Corner Brook, NL

Graham
Dear Chair of WERAC Committee,

Mineral exploration, including prospecting, are professions regarded as essential building blocks to the discovery and development of our Province's rich mineral resources. Hundreds of billions of dollars have streamed from our mineral deposits to the benefit of our province and is a direct result of traditional "boot and hammer" prospecting. Since the 16th century discovery of the Wabana Iron Ore to the recent discovery of the Voisey's Bay Deposits and the present day emergence of one of Canada's largest undeveloped gold deposits (4 million ounces with a Present Day Value of \$10 billion!) at Valentine Lake, basic prospecting has been very important and has not impacted the environment, instead being comparable to traditional outdoor activities like hiking, berry picking and trout fishing all so familiar to us in this vast, resource rich province.

The Voisey's Bay discovery in 1993 by 2 of our provinces' prospectors not only unlocked these rich metal deposits for mining (globally regarded as the mineral discovery of the 20th century), but resulted in the multi billion dollar hydro metallurgical plant at Long Harbour and the modern (INCO) Innovation Centre at Memorial University, a centre of learning attracting professionals world-wide. Voisey's Bay and it's spin-offs in just 2 decades have contributed billions of dollars for job creation, contracting and servicing, together with paying a high share of royalty taxes, payroll taxes and HST, and has positioned Newfoundland and Labrador at the leading edge of advancing mineral resource technology.

Continuous mining on the Baie Verte Peninsula for 180 years demonstrates the sustainability of the mining industry, also confirmed by the 50 years of past mining operations at Buchans, the richest mine to ever be discovered in the North American Appalachians and the more than 70 years of iron ore mining in the Labrador Trough at Labrador City, Wabush and Schefferville with the high quality IOC pellet being the standard for valuation of iron ore pellets world-wide. The Labrador mines have opened up new opportunities for the people of our province giving them a secure place to live, grow their children and prosper, and ensuring the delivery of socio-economic programs for the benefit of the indigenous peoples.

Prospecting, mineral exploration and mining is highly regulated and during the past several decades has been subject to wide reaching rules and controls imposed provincially and nationally to mitigate environmental impact and promote conservation; the industry has responded responsibly and today is one of the most regulated natural resource industries in Canada. Sustainable development is the new normal, and as global economies go green, demand for minerals will grow substantially and this province and country can be a world leader on this

front, but will only be able to achieve this objective and status with unrestricted access to its vast mineral resource land base.

Our premier and your government in recognizing the importance of centuries of mineral exploration and mining in 2018 put forward a blueprint labelled “ the Path Forward”- A New Mineral Strategy which maps out their plan to ensure the viability and sustainability of the mineral exploration and mining industry as an economic driver; the target of having 5 new producing mines by 2030, along with increasing the full time work force by 50% and increasing annual mineral exploration expenditures to \$100 million dollars. Ensuring this path forward can be achieved is now vitally important with the burgeoning tax load and challenging social and economic times we face from Muskrat Falls and the fall out from Covid- 19 require all hands on deck. The doubling down we can anticipate from the federal government as it relates to funding programs and increased tax burdens in the wake of the current crisis requires all of us to think outside the box and be inclusive in our collective decision making, policy development and roll out.

The premier, provincial and federal governments are now implementing timely delivery of programs to the Offshore Petroleum Industry operating around our shores relieving the industry of many of the “onerous regulations” imposed on the industry by overly strict and regulated environmental rules and control. Their new policies are intended to provide a more realistic, effective and efficient permitting and exploration approval process.

This same proactive approach is now essential to ensuring the continued driving force and sustainability of the mineral exploration and mining industry which since the 1840's have streamed revenues in the hundreds of billions of dollars, being the highest and most sustainable natural resource, socio-economic driver in the province. Recent mine operations together with secondary and tertiary industries such as Voisey's Bay and it's spin offs with foreseeable decades of continued operations and new mining developments such as the Valentine Lake Gold Deposits ensure the future of our province and the existence of rural areas, and our rightful place as a diverse and unique geographic and populated region of Canada and our planet.

The proposed Protective Areas Plan stands squarely in the path of the way forward designed and presented to the people of Newfoundland and Labrador by the Premier and government for the mineral exploration and mining industry. Simply because the ideology of removing tracks of ground from everyone's use prevails over current global programs of cooperative approaches which can satisfy multiple user groups to their mutual benefit and preservation. Imposition and enforcement of this plan will diminish the almost 200 year benefits accrued from the industry and drive another nail into the elimination of rural Newfoundland and Labrador, It will also destroy our uniqueness as a resource rich region making another whip for our social and economic decline.

Our unique geological and mineral resource setting is of global significance which has and continues to be not only the focus of world attention for studying and advancing mineral deposits, mining and processing operations & technology, (the same purposes of promoting our off shore petroleum resources), but also continental drift and plate tectonics. Areas such as the Baie Verte Peninsula and the Bay of islands have provided the information to geoscientists from universities such as Princeton, Harvard , Oxford and Cambridge in piecing together continental drift and plate tectonics, essential to understanding the dynamics and evolution of our planet

The uniqueness and value of our mineral resources are also reflected by the St. Lawrence Fluorspar Mine, one of only a few fluorspar mines in the world and currently the richest. Recommencing mining of this resource as a world-class mining operation has injected new social and economic life into the Burin Peninsula.

The recent discovery of the Voisey's Bay Deposits just 25 years ago confirms the potential of our mineral resources is much greater than we realize, prior to this discovery there was no indication of these rich deposits. A review of the areas being proposed for the PAP confirms if allowed to be implemented will remove large tracts of

lands which recent prospecting and mineral exploration just in the early stages of this century have already identified undeveloped, potential resources such as vanadium (globally regarded as the mineral of the 21st century, and a green shift mineral used for electrically powered cars) and titanium along the Burgeo Highway. The favourable geological setting and surface extension of these mineral deposits next to this known resource is included under the proposed PAP as an area to be removed into perpetuity from future prospecting, exploration and mine development despite the fact that these strategic metals are becoming more vitally important to and needed by the global community!

We are evolving into a global community with equality, fairness and inclusivity for all, the PAP contravenes this global structure, it is one of exclusivity and not inclusivity. In this continuing dynamic and evolving world community the principles of inclusivity, equality and fairness is the path forward, a theme which is supported by the premier and all levels of government, and increasingly becoming more important on the world stage. Any new proposed land use has to benefit all citizens of this province and not just a few.

The solution, and the only solution is Multiple Land Use, access for all adhering to the rules and regulations imposed and thereby not excluding anybody from their rights to benefit from what the planet offers and for us in NL to benefit from our rich natural mineral endowments. Anything else does not fit the plan for our global community. MLU is being practised successfully by some of the more progressive and globally responsible governments and countries. The fact is, mining and conservation can work hand in hand if it is allowed to do so.

Newfoundland and Labrador for centuries has been a leader and important participant on the global scene in uncovering, researching and developing our natural (mineral) resources; for us to continue we need to have access to our resource rich land base much of which has been grievously removed and now with more exclusivity being proposed under the PAP. Reviewing the documentation and map put forward it is obvious that the people of Newfoundland and Labrador will be compromised in having a deserving future.

Not only should we ardently pursue and assume leadership for Multiple Land Use here at home, but as a global priority. In view of current socio-economic challenges adopt the policy of Multiple Land Use for those areas indiscriminately and without sufficient due process already having been removed.

The executive and membership of the Newfoundland and Labrador Prospectors Association would like to be included in discussions of land use in the future, and we await any response or request for more information that might be requested.

Respectfully Submitted,



Norm Mercer

President, Newfoundland and Labrador Prospectors Association

cc. Premier Dwight Ball

Gerry Byrne Minister of Fisheries and Land Resources

Siobhan Coady Minister of Natural Resources



Faculty of Science

Department of Biology
232 Elizabeth Ave, St John's, NL Canada A1B 3X9
Tel: 709 864 7498 Fax: 709 864 3018 www.mun.ca/biology/

September 16, 2020

Wilderness and Ecological Reserves Advisory Council
Department of Fisheries and Land Resources

Re: Protected Areas Plan for the Island of Newfoundland

Dear WERAC:

With this letter I wish to provide my full support for the proposed Protected Areas Plan for the Island of Newfoundland. I thank members of WERAC, past and present, for their tireless work to complete and release this plan. Below I provide my assessment of this plan as an expert in systematic conservation planning for over 15 years and a resident of NL.

Protected areas are the cornerstone for effective conservation of natural resources. Newfoundland is blessed with a bounty of natural resources and most Newfoundlanders take full advantage of these resources via fishing, camping, harvesting, hiking, etc. Research in protected areas planning clearly demonstrates that protected areas are essential for the maintenance of natural places and resources. An investment in protected areas is an investment in the present and future sustainability of the Newfoundland way of life. The Island of Newfoundland is way behind other provinces and Canada's international commitment to have 17% of lands protected by 2020. The proposed plan will bring the province closer to attaining this goal.

The three priorities for protection outlined in the Protected Areas Plan for the Island of Newfoundland (i.e., wild and intact areas, representation of natural regions, and conservation of unique/rare features) is based on sound science. I agree that these are the pillars for protected areas planning. It is noteworthy that the plan considers enduring features as such features are important to conserve in order to maintain ecological representation through time – particularly in light of climate change.

WERAC has presented a well-balanced plan in that many activities will be allowed in the proposed protected areas. Scientific research shows that protected areas are most successful when local residents are involved and allowed to participate in planning and in some sustainable activities within protected area boundaries. Providing a core area is conserved, many protected areas can sustain some level of tourism and Newfoundland has not fully realized the potential economic and tourism benefits from protected areas.

Overall, as a scientist, I was disappointed not to see any detailed methods in the proposed plan or supplemental information. Because these details were missing, I can not comment on specific technical aspects of the design. That said, it is clear that the science is sound underlying the plan. I will use two examples to illustrate. First, the proposed Cloud River protected area is designed to capture the whole Cloud River watershed and whole watershed conservation is critical and often overlooked. Second, the proposed Conne River North protected area contains important riparian habitat for a dwindling Atlantic salmon population – conservation of this area may be critical for the recovery of this population.

Finally, as a resident of Newfoundland with two young children, I see an investment in protected areas as an investment in our future. We must increase the number of protected areas in this province in order for our children to have the same opportunities to enjoy nature as the current generation.

Sincerely,

Shawn J. Leroux, PhD
Associate Professor, Department of Biology, MUN, Tel: 709 864 3042, Email: sleroux@mun.ca

St. Anthony and Area Chamber of Commerce
87-95 West Street 2nd Floor
PO Box 650
St. Anthony, NL A0K4S0



September 25th, 2020

To whom it may concern,

As President of the St. Anthony and Area Chamber of Commerce, I want to voice on the conversation regarding WERAC's proposed establishment and management of wilderness and ecological reserves on the Great Northern Peninsula. The purpose of this letter is not to bombard you with information and facts that have most undoubtedly been provided to you by individuals and businesses that fall within our membership, but simply to share our thoughts on the proposal and the impacts we feel it will have on our residents.

It goes without saying that Newfoundland and Labrador is known for its natural beauty and that the people of this province equally enjoy "getting out in the country" to enjoy that beauty. We appreciate what we have been blessed with, take pride in it and understand the importance of preserving it. This certainly goes without question.

The concerns expressed by our membership, which I am sure have already been shared with your committee, are twofold and revolve around recreation/outdoor living and economic development.

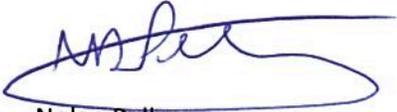
First of all, residents of the Great Northern Peninsula, as I am sure many people of our province, enjoy the great outdoors. There is so much to do fishing, hiking, snowmobiling, berry picking, hunting, spending time at the cabin.....the list goes on. Should WERAC's proposal move forward as presented, some of these activities will become limited and/or eliminated. This is saddening as these are the very things that make Newfoundlanders and Labradorians who they are; it's embedded within our culture.

Secondly, one of the mandates of our chamber of commerce is to encourage economic growth and development in our area. We feel that the proposed reserves will have a negative impact for both present and future business opportunities. One example comes to mind. We have numerous Outfitters operating on the Great Northern Peninsula who depend on these proposed areas for their livelihood. Another example that comes to mind is regarding future development. Should the proposed plan proceed, what would this mean should there be evidence of minerals/oil in these areas? Please do not misunderstand. We are not suggesting that economic development should take precedence over preservation of natural and unique beauty. But you have to understand that in an area that struggles to create new opportunities for business which will result in economic and community growth, this is a major concern of ours should these potential opportunities be removed from the table.

As a Chamber of Commerce, concerned about the residents and businesses on the Great Northern Peninsula, we feel that the proposed areas in WERAC's report should be reviewed. We also feel that the

people of Newfoundland and Labrador should have been engaged earlier in the process and not after the recommendation has been ultimately made.

Kind regards,

A handwritten signature in blue ink, appearing to read 'Nolan Pelley', is written over a horizontal line. The signature is fluid and cursive.

Nolan Pelley

President, St. Anthony and Area Chamber of Commerce



TOWN OF RALEIGH
PO Box 119
Raleigh, NL A0K 4J0
Office: 709 452 4461 Fax: 709 452 2135
e-mail: townofraleigh@nf.aibn.com



June 8th, 2020

Executive Secretary, WERAC
c/o Natural Areas, Land Management Division
Department of Fisheries and Land Resources
P.O. Box 2006
Corner Brook, NL
A2H 6J8

werac@gov.nl.ca

Re: A Home for Nature: Protected Area Plan for the Island of Newfoundland proposal

To the Wilderness and Ecological Reserves Advisory Council

On behalf of the Town Council of Raleigh we would like to express our concern with the proposed large sections of land identified on the Great Northern Peninsula in the Protected Areas Plan. **The area proposed for the Great Northern Peninsula is larger than anywhere else in the province.**

While we understand and appreciate the importance of conservation and protection of our land, the recommendations in this report bring forward many questions, comments and concerns. Of major concern is the impact on future economic development and exploration in the outlined areas, for example, the forestry sector, mining potential and tourism, etc. The GNP has been struggling for economic sustainability and new developments for many years. If this plan is approved, **it will present as a further deterrent for future interest/ investment thus imposing more restrictions and delays in getting approvals for land access and permits. It may even deny access and permits.** There is also much concern about what the additional restrictions this plan, if approved, will have on existing outfitters and tourism operators.

Another concern is the **potential impact this plan will have on our ability to stay connected to our culture and practice our traditions.** The people of the GNP maintain strong ties and live off the land. Hunting, fishing, boating, camping, and collecting firewood has always been and still continues to be the way of life for most people living on the GNP. In taking part in these activities the people have done so with much concern and protection of the environment of which they live. They have proven to be great caretakers of the land and resources which they depend on.

The delivery of this proposed 'protected area plan' should have been introduced to the public in a much better way. As noted in the report, the "Protected Area Plan for the Island of Newfoundland" was 25 years in the making. It's sad that in all this time no one thought to consult with the people who would be most affected by this plan. Given the COVID situation, the timing for the release of this report all but eliminates the ability for group consultation and discussion. This process should have taken place before the presentation of the report.

As recommended by others on the Great Northern Peninsula and given the extreme importance of this matter, and the potential serious impact it will have on this area, the Great Northern Peninsula, we are **asking that the process for public consultation occur before the written submissions is requested.** It is important that the details are shared with the people and the people have an opportunity to respond and have input into the whole process. We are also requesting that this process be delayed until after the COVID situation and in-person consultations can occur in our communities.

Sincerely,

Cyril Taylor, Mayor

Cc: Great Northern Peninsula Joint Council

Christopher Mitchelmore, Minister of Advanced Education, Skills and Labour

Gerry Byrne, Minister of Fisheries and Land Resources

Premier Dwight Ball



TOWN OF RODDICKTON-BIDE ARM

P. O. Box 10 · 81 Major's Street · Roddickton · NL · Canada · A0K 4P0

Tel. (709) 457-2413 · Fax (709) 457-2663

email: roddickton@nf.aibn.com

Website: roddickton.bidearm.ca

Sheila Fitzgerald
Mayor

Della DeMoss
Deputy Mayor

Paula Snook-Randell
Town Manager

June 2nd, 2020

Executive Secretary, WERAC
c/o Natural Areas, Land Management Division
Department of Fisheries and Land Resources
P.O. Box 2006, Corner Brook, NL A2H 6J8
werac@gov.nl.ca

RE: A Home for Nature: Protected Area Plan for the Island of Newfoundland proposal

To the Wilderness and Ecological Reserves Advisory Council:

On behalf of the Town of Roddickton-Bide Arm we would like to express our serious concerns with the proposed Protected Areas Plan for the Great Northern Peninsula (GNP). The land *identified for the GNP is larger than anywhere else in the province and includes a substantial section of land surrounding our Town.*

While we understand the importance of land conservation, we have many concerns with this report. We are very worried about the impact this plan (if approved) will have on the following areas:

- **Revitalization of the Forestry Sector** - We are a forestry town with the forestry being our main source of “bread and butter.” The plan includes a large section from areas 17 and 18.
- **Economic Development** – We have several outfitter and tourism operators in the area.
- **Future Mining Exploration** – Several favorable mining deposits have been located in and around our Town.
- **Land Permits** – Getting access to land and land permits is a very long and cumbersome process now. This will make it even more difficult with additional red tape to get a (domestic and/or commercial) land permit approved.
- **Cabin Owners** – There are several cabin owners in the area and many residents living away that talk about coming home to retire and/or build summer cottages.
- **Cultural Connection** - The people of this Town have strong ties to the land (i.e. hunting, fishing, boating, camping, collecting firewood and ATV use). This has been our way of life for many generations and a lifestyle that we maintain to this day.

We also believe that the timing for the release of this report is not good because of the COVID situation. Given the extreme importance of this matter, and the serious impact it will have on this area, we are requesting the following to be considered:

- **Hold Community Consultations** – Conduct in-person “Town Hall” meetings and explain to the people what exactly is in this report. Members of our town and/or our seniors many not have access or are familiar with using the internet but have valuable contributions to make regarding this matter.
- **Extend the Deadline Date for Public Feedback** – Given the COVID situation this is not a good time to be presenting new, non-urgent reports looking for feedback, when everyone is focusing on trying to keep themselves and their families safe. This report was 25 years in the making, it can wait another 1-2 years to be finalized.

Should you wish to discuss this matter further we would certainly welcome the opportunity to do so.

Sincerely,

Sheila Fitzgerald, Town of Roddickton-Bide Arm, Mayor

cc. GREAT Northern Peninsula Northeast Regional Council members, GREAT Northern Peninsula Joint Council, Christopher Mitchelmore - Minister of Minister of Advanced Education, Skills and Labour, Gerry Byrne - Minister of Fisheries and Land Resources, Premier Dwight Ball, Ches Crosbie - Opposition Leader, Alison Coffin - Leader of the NDP



Don Ivany – Director Programs – Newfoundland and Labrador
19-21 West Street, Corner Brook, NL, A2H 2Y6
Phone/Fax: 709-632-5100 (off); 709-632-1155 (cell); E-Mail: divany@asf.ca

October 01, 2020

Wilderness and Ecological Reserves Advisory Council
c/o WERAC Secretariate
Department of Fisheries and Land Resources
Natural Areas Section, Land Management Division
P.O. Box 2006
Corner Brook, NL
A2H-6J8

Re: ASF Response to “A Home for Nature: Protected Areas Plan for the Island of Newfoundland”.

To WERAC,

The Atlantic Salmon Federation (ASF) welcomes the opportunity to provide input in response to the Draft Protected Areas Plan for the Island of Newfoundland, that was released by the Wilderness and Ecological Reserves Advisory Council (WERAC) in May of this year for public input. ASF is an International, non-profit, charitable organization dedicated to the conservation, and protection of wild Atlantic salmon and the ecosystems on which their well being, and survival depend. In addition to being the oldest and largest wild Atlantic salmon conservation organization in North America, ASF has had a strong presence in Newfoundland and Labrador for nearly forty years. To this day we have an office in NL, and we continue to have a strong membership base in this province. We also work closely with the Salmonid Council of Newfoundland and Labrador (SCNL), and their many Affiliate Groups throughout this province. During the past forty years, ASF has been actively involved in numerous conservation, restoration, education, and research programs in support of wild Atlantic salmon throughout Newfoundland and Labrador. We have also been involved in numerous advocacy campaigns in this province in support of wild salmon conservation, and of environmental protection in general. So, it is with great pleasure that we welcome the opportunity to provide feedback to you regarding the release of your ‘Draft Protected Areas Plan for the Island of Newfoundland’.

But first we would like to commend all the members of the Wilderness and Ecological Reserves Advisory Council (WERAC), both current and past, for their dedication and hard work developing this draft plan and for bringing it forward for public input. As a result of your efforts, many special places in Newfoundland will hopefully be protected from industrial development, and other harmful uses that might otherwise cause long-term and irreparable damage to them. Equally as important, is the fact that many traditional recreational uses will continue to be allowed in these protected areas, thus ensuring that these special places will be enjoyed and appreciated by both current and future generations, for many years to come.

The Atlantic Salmon Federation is pleased to go on record in support of WERAC's 'Draft Protected Areas Plan for the Island of Newfoundland'. It is clearly obvious that much work and effort has been spent developing this plan, which has been 25 years in the making, often against the backdrop of competing industrial interests and the politics that comes along with them. We recognize that because of such competing interests the current protected areas plan being proposed is not perfect. However, it is in our opinion a major step forward in making sure that many of these very special places in Newfoundland are protected and carefully managed for the benefit of society.

As you may already know, ASF wrote to WERAC on April 07, 2020 (see copy of letter attached), encouraging WERAC to give serious consideration to including the protection of a representative number of salmon rivers (whole watersheds) throughout the Island, as part of the areas protection plan. We are pleased to note that in your proposed plan a couple of rivers on the Island are indeed proposed for protection in their entirety (i.e. Cloud River and Soufflets River). We note as well that sections of several other rivers are also proposed for protection (such as: sections of Conne River, North and South Great Rattling Brooks, Rodney Pond in the Gander River watershed, Gambo Pond in the Gambo River watershed). However, we must admit that we are disappointed that a larger representative sample of whole watersheds were not proposed for protection under the current plan.

As we pointed out in our letter to WERAC on April 07, 2020, there are upwards of 200 scheduled salmon rivers in NL, and approximately 300 rivers in total that have salmon in them. Yet, to our knowledge only two of these 300 watersheds are currently protected from industrial development (Main River and Bay De Nord River). So, while we appreciate that in terms of protecting salmon rivers, the proposed plan is a positive step in the right direction, it does fall short in this area. Therefore, we strongly encourage WERAC and to seriously reconsider proposing a larger representative sample of salmon rivers for protection as part of the current protected areas plan. For example, all the salmon stocks in rivers on the South Coast of Newfoundland (DU 04) have been assessed as 'Threatened' by COSEWIC. Some of these stocks are so low that they are currently at serious risk of extinction, yet none of these major rivers are proposed for protection in their entirety in this plan. There are also some unique rivers on the Island of Newfoundland, such as Beaver Brook on the Great Northern Peninsula, that flows underground for an extended length, and salmon migrate through this area. This is a phenomenon that is considered extremely rare for Atlantic salmon world-wide. But again, this unique river was not proposed for any protection under the current proposal. Again, we

suggest that this is a major oversight, especially considering that one of the main goals for creating a protected areas plan is to protect such unique areas for tourism potential, and another is to promote recreational use.

Furthermore, we note from your proposed plan that while NL is one of the largest regions in Canada (geographically speaking), as a province only 6.7% of the province is currently under protection. Of this amount 2% is under federal protection, meaning only 4.7% of the protected areas are under provincial protection. We also note from your document that this means, that of the ten provinces and three territories in Canada, NL places third from the lowest in terms of the total area that we currently have under protection. We also note that if the 26 areas proposed for protection in the current plan are approved tomorrow, the area under protection in the province would only increase to 8.5%. In our opinion this is very low when compared to other jurisdictions in Canada, and as such is not acceptable. It would seem to us that designating several other salmon rivers/watersheds for protection in your current plan would be a great way to protect salmon and salmon habitat, and to increase the total area under protection in this province at the same time. With this in mind, the Atlantic Salmon Federation would welcome the opportunity to share our views and advice with WERAC on which other rivers on the Island of Newfoundland we feel deserve to be considered, and included for protection, under the proposed areas protection plan.

Finally, in keeping with Phase 1 of the consultation process regarding your proposed protected areas plan, and what kind of activities should be permitted in the various reserves proposed, our view is simply this. Where ever possible, traditional recreational uses of these reserves should be permitted, in an effort to receive public support for creating the reserve, as long as the traditional use itself does not threaten, in any way, the integrity of the reserve and the reason it was established. If it does, the consideration should be given to preventing or minimizing such activities. It is also our opinion that no industrial activities of any kind should be permitted in such protected areas. Afterall, this is one of the main reasons many of these reserves are proposed and created.

With respect to phase 2 of the consultation process, we recognize that, should the current draft protected areas plan be supported by the public, there will be further public consultations for each specific area proposed in the plan, to give the public and people in adjacent areas an opportunity to have further input in developing the boundaries of each area. We look forward to such consultations with anticipation, and to providing further input on some of these areas once the process reaches that stage.

In conclusion, we wish to reiterate that we support, in principle, the current 'Draft Protected Areas Plan' for the Island of Newfoundland, with the caveat that more salmon rivers/watersheds should be included in the plan. In the meantime, we look forward to providing further input as the process moves forward. Again, we wish to extend our thanks to all those involved in the preparation of the current 'Draft Protected Areas Plan for the Island of Newfoundland' and we look forward to its eventual implementation.

In the meantime, should you have any questions or comments regarding our submission please feel free to contact us anytime.

Yours Sincerely,

A handwritten signature in blue ink, appearing to read 'D Ivany', with a long, sweeping flourish extending to the right.

Don Ivany

c.c. Leo White – President Salmonid Council of Newfoundland and Labrador
Honourable Elvis Loveless – Minister of Fisheries, Forestry, and Agriculture



Mr. Graham Wood, Chair
WERAC
Department of Fisheries and Land Resources
P.O. Box 2006
Corner Brook, NL
A2H 6J8

werac@gov.nl.ca

June 3rd, 2020

RE: A Home for Nature: Protected Area Plan for the Island of Newfoundland proposal

To the Wilderness and Ecological Reserves Advisory Council:

On behalf of the Town of Port au Choix we would like to express our serious concerns with the proposed Protected Areas Plan for the Great Northern Peninsula (GNP). The area proposed for the Great Northern Peninsula is largest in the province. This area has been and is used by many of our residents both past and present.

While we can appreciate the importance of conservation and protecting our land, there are many questions and concerns that need to be addressed regarding the recommendations in this report. We strongly feel that this should have been done before your proposal was released.

At our Council meeting on June 2nd, we unanimously agreed to fully object your Ecological reserve proposal for the Great Northern Peninsula.

Port au Choix council is willing to meet with your board at any time to further discuss.

Sincerely

Donald Spence
Mayor



*Town of Torbay Environment
Advisory Committee (TEAC)*

WERAC Secretariat
Wilderness and Ecological Reserves Advisory Council (WERAC)
Department of Fisheries and Land Resources
Natural Areas Section, Land Management Division
P.O. Box 2006
Corner Brook, NL
A2H 6J8
Email: werac@gov.nl.ca

October 1, 2020

RE: "A Home for Nature: Protected Areas Plan for the Island of Newfoundland"

Dear Advisory Council members,

The Town of Torbay Environment Advisory Committee (TEAC) is responsible for providing recommendations, guidance, and advice on issues relating to environmental matters to the Planning and Land Use Development Committee (PLUD) of the Town of Torbay. The Committee acts in an advisory capacity to Council, and strives to increase awareness, knowledge and critical thinking in the area of environmental issues and sustainable environmental practices within the Town.

TEAC has reviewed ***"A Home for Nature" - the Wilderness and Ecological Reserves Advisory Council (WERAC) Protected Areas Plan for the Island of Newfoundland***, and offers the following commentary:

Newfoundland is a special place. We are very fortunate that much of our island home retains unspoiled areas of natural diversity and beauty, a legacy of some of our cultural heritage (including L'anse aux Meadows, Cupids, Ferryland, and Torbay itself), and a healthy environment for residents. We are in a position to safeguard for the world such rare and vulnerable treasures as our Atlantic puffin colonies and the *Ediacaran* fossils at Mistaken Point and the Bonavista Peninsula.

The Town of Torbay, as a close neighbour of the City of St. John's, is a representative example of a community working to find a balance between its historic area and cultural history, its modern residential spaces with families of all ages and make-up, local business infrastructure and a beautiful natural environment on one of the most spectacular coastal areas in Canada.

Finding such a balance is in line with Torbay's efforts to support the residents of Torbay while protecting our natural environment for future generations. Evidence of the Town's commitment to respecting and protecting the natural environment and creating natural spaces for Torbay residents to enjoy and benefit from include an expanding network of walking trails within the town, the Memorandum of Understanding signed with the East Coast Trail Association, vigilance in protecting our coastal Conservation Zone and other protected areas, participation in the Climate Change Vulnerabilities program, membership in the Stewardship Association of Municipalities of Newfoundland and Labrador and more.

Decisions have not always been easy as the demands of business, land ownership, development and protecting the environment sometimes conflict, but we take heart from the efforts of the Town Council and staff to find solutions to these competing demands.

TEAC commends WERAC in that the proposed WERAC Protected Areas Plan attempts to do the same thing: to preserve and protect what is unique, special, and in some cases endangered, of Newfoundland's cultural heritage and the natural environment and the plant and animal species within it, while allowing residents to enjoy and benefit from the resources of our island. The plan is the result of countless hours of careful and dedicated work by WERAC members. Some of the restrictions described already exist, and where new restrictions or proposed Ecological Reserves and Transitional Reserves are presented, they come with good and compelling reasons for the protected areas and restricted activities within them. Minor restrictions in some areas will result in large gains by the province and residents for many years to come.

In addition, **TEAC wishes to encourage the Government of Newfoundland & Labrador to expand its scope in establishing future protective frameworks for:**

1. Existing parks and trail networks of provincial significance, such as the East Coast Trail.
2. Existing wetlands and waterbodies, such as wetlands currently protected through agreements via the Stewardship Association of Municipalities / Eastern Habitat Joint Ventures.

Provincial protection and associated legislation and regulations provide stronger guidance on what role these systems play in our natural and cultural heritage.

Newfoundland is at a critical juncture where we can make good decisions regarding our natural environment - decisions that will benefit both future generations and our future environment - and this is the time to commit to these choices.

The realities of climate change that impact Torbay now and in the future are a serious and immediate concern that the Protected Areas Plan will help mitigate. For this reason, we believe the WERAC Protected Areas Plan should be endorsed as presented.

As a final note, we offer the following comment.

Currently, 6.7 percent of the Island of Newfoundland is a protected area (A Home for Nature - Protected Areas Plan for the Island of Newfoundland, page 2).

According to the United Nations Convention on Biological Diversity Strategic Plan's Target 11, the aim is that by 2020, at least 17 percent of terrestrial areas and inland water, and 10 percent of coastal and marine areas, will be conserved through networks of protected areas and other effective area-based conservation measures. [National Biodiversity Strategies and Action Plans (NBSAPs)].

<https://www.cbd.int/countries/targets/?country=ca>

Newfoundland has a way to go to achieve these goals and 2020 is running out. Endorsing the Protected Areas Plan for the Island of Newfoundland as proposed by WERAC will help move our island and Canada a little closer to this goal. Our support will also establish Torbay as a community looking toward the future while maintaining and enhancing the quality of life we enjoy in Torbay.

If you have any questions about this submission, please contact me at hicksrobbie20@gmail.com.

Respectfully submitted,

Robbie Hicks, Chair
Torbay Environment Advisory Committee

C.c. Mayor and Council, Town of Torbay

Natural Areas System Plan 2020: A Review of Ecosystem Representation in Existing and Proposed Protected Areas on the Island of Newfoundland

Prepared for:



Prepared by:

Feaver's Lane Enterprises Inc.



August 2020

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1. Introduction

On May 29, 2020, the Government of Newfoundland and Labrador through the Wilderness and Ecological Reserves Advisory Council (WERAC) released A Home for Nature: Protected Areas Plan for the Island of Newfoundland (WERAC, 2020). The plan is the culmination of 25+ years of planning. During that time, it was generally referred to as the Natural Areas System Plan (NASP), and this report uses that name. Existing and proposed protected areas are mapped in Figure 1, with the proposed protected areas labeled numerically in the map and listed in Table 1. Releasing the NASP for public comment is a very important step, as it lays out the overall vision for protected areas on the Island of Newfoundland and describes the public process for engagement.

The analyses summarized here are intended to add value to the science and planning that have informed the NASP as presented by WERAC (2020). The purpose of this report is to:

- Summarize the area of existing and proposed protection.
- Assess representation improvements, at Island-wide and Ecoregion and Subregion scales, across a suite of biotic and abiotic features of conservation interest that describe key variations in the natural landscape.
- Highlight features that are well-represented and under-represented (gaps) when considering their proportions in existing and proposed protected areas relative to their proportions Island-wide and by Ecoregion and Subregion.
- Report on noteworthy overlaps and gaps between protected areas and other features of conservation interest, including caribou, marten, wetlands and intactness.

Table 1 - Proposed Protected Areas

| Label | Name | Label | Name |
|-------|-----------------------------------------------|-------|-----------------------------------------|
| 1 | Cape Norman - Proposed Reserve | 17 | Stony Lake - Proposed Reserve |
| 2 | Watts Point Extension - Proposed Reserve | 18 | Conne River North - Proposed Reserve |
| 3 | Boiling Brook - Proposed Reserve | 19 | Facheaux Bay - Proposed Reserve |
| 4 | Hare Bay Islands Extension - Proposed Reserve | 20 | Banting Lake - Proposed Reserve |
| 5 | Mare Cove - Proposed Reserve | 21 | Rodney Pond - Proposed Reserve |
| 6 | Cloud River - Proposed Reserve | 22 | Gambo Pond - Proposed Reserve |
| 7 | Highlands of St. John - Proposed Reserve | 23 | Random Island - Proposed Reserve |
| 8 | Soufflet's River - Proposed Reserve | 24 | Halls Gullies - Proposed Reserve |
| 9 | Little Cat Arm - Proposed Reserve | 25 | Ripple Pond - Proposed Reserve |
| 10 | Spirity Cove - Proposed Reserve | 26 | St. Shott's - Proposed Reserve |
| 11 | St. Paul's - Proposed Reserve | 27 | Mare Cove - Transitional Reserve |
| 12 | Bras Mort Bog - Proposed Reserve | 28 | Soufflet's River - Transitional Reserve |
| 13 | Barachois South - Proposed Reserve | 29 | Cape St. George - Transitional Reserve |
| 14 | Cape John - Proposed Reserve | 30 | Barachois South - Transitional |
| 15 | Eastern Tolt - Proposed Reserve | 31 | Facheaux Bay - Transitional Reserve |
| 16 | Swan Island - Proposed Reserve | 32 | Gambo Pond - Transitional Reserve |

Island of Newfoundland Protected Areas 2020



Sources:
Government of Newfoundland and Labrador
Government of Canada

-  Existing Federal Protected Areas
-  Existing Provincial Protected Areas
-  Proposed Protected Areas

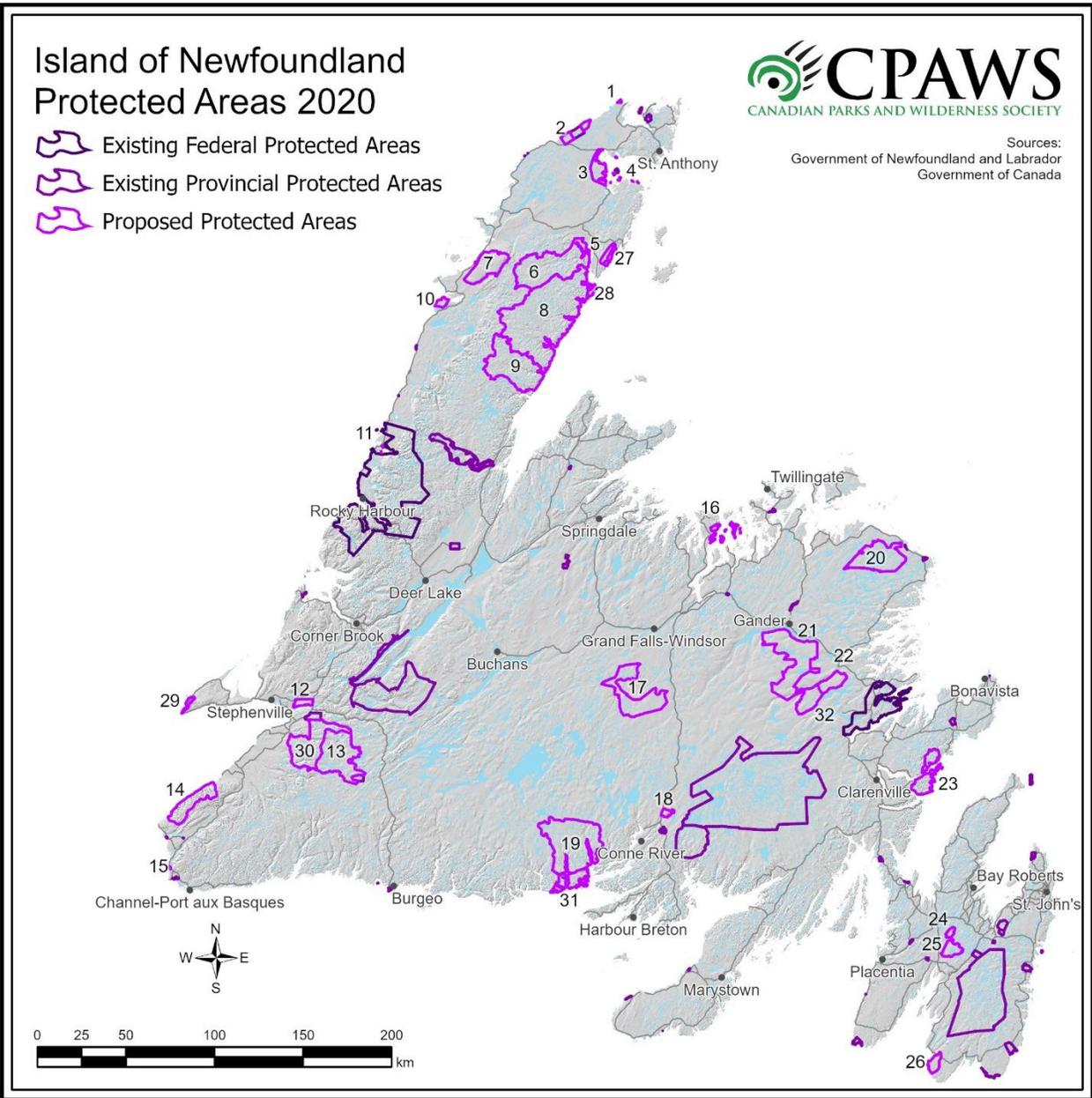


Figure 1 - Protected Areas 2020

The provincial protected areas framework is filter-based, with three components (WERAC, 2020; Notzl et al., 2013):

- Coarse Filter – large areas for wide-ranging species such as Caribou, including the Torngat Mountains and Mealy Mountains National Parks and the previously proposed Atikonak Lake reserve (NASP, 1996) in Labrador, and the Bay du Nord and Avalon Wilderness Reserves on the Island of Newfoundland.
- Ecosystem Representation – capture the natural character and environmental variation of the landscape, generally in mid- and larger-size protected areas. Representation is applied using the Ecoregions and Subregions adopted by the Government of Newfoundland and Labrador (Meades and Moores, 1994; Damman, 1983; Figure 2 and Appendix B), which are areas of similar ecology.
- Fine Filter – capture special features not covered in the larger protected areas including, where necessary, uncommon habitats and species (e.g. the limestone barrens and the rare/endemic plants that occur there) and critical sites (e.g. seabird breeding colonies).

The analyses described in this report relate primarily to ecosystem representation. We do not include fine filter (special features) analysis, as that requires detailed datasets and both theoretical and practical ecological expertise from numerous fields to be done effectively, nor do we cover marine features.

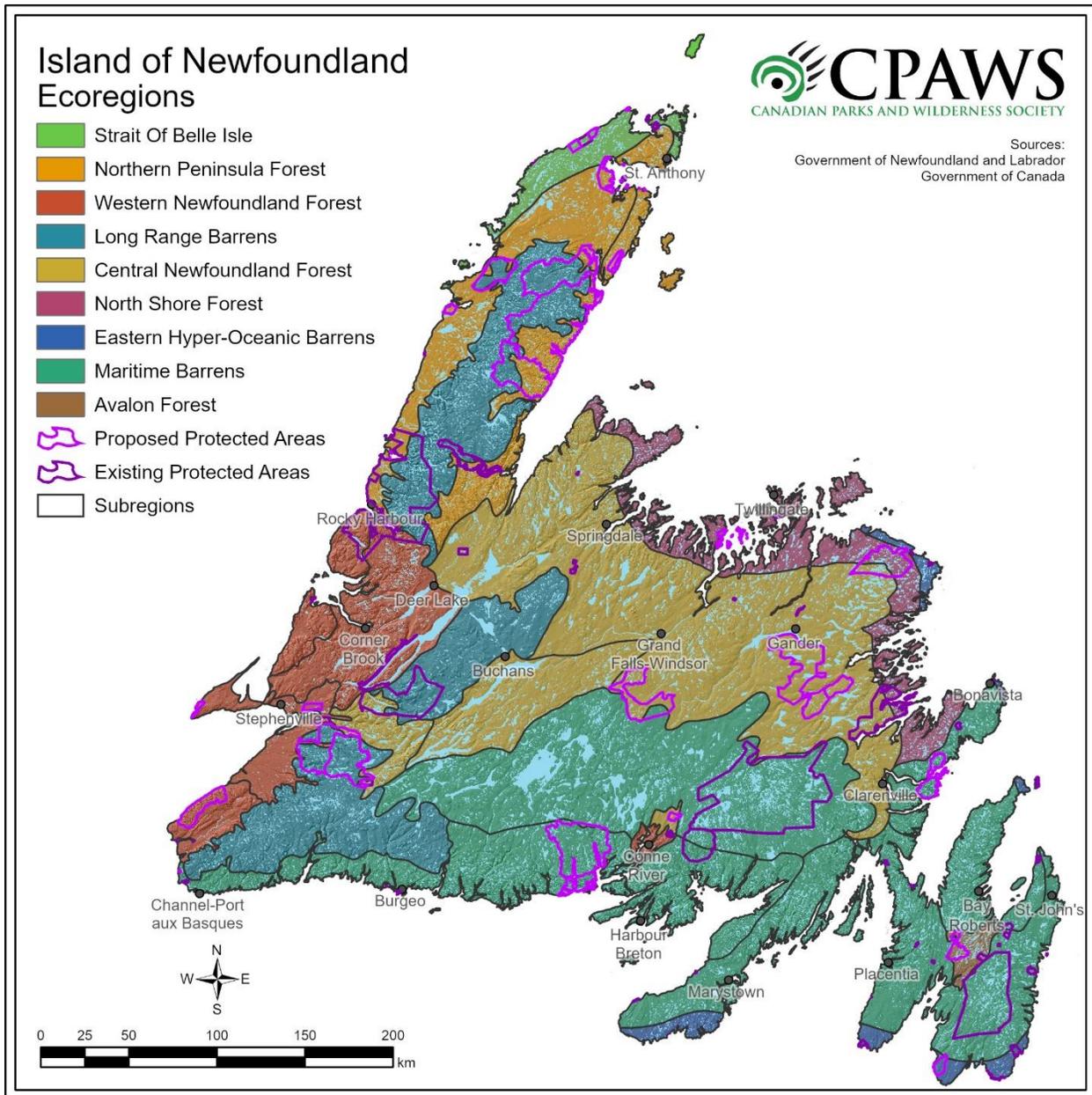


Figure 2 - Ecoregions

2. Analysis Methods

All analyses are based on existing datasets converted to 100 m X 100 m (1 ha) raster cells and analyzed using zonal statistics (spatial overlay) in geographic information system (GIS) software. The Island of Newfoundland basemap used for the analyses was converted to 100 m X 100 m (1 ha) raster cells from the shapefile of Ecoregions and Subregions shown in Figure 2 above.

The specific analyses are:

- Percent protected in existing and proposed protected areas, island-wide, by Ecoregion and by Subregion.
- Improvements in the coverage (representation) of features (input data) of conservation interest provided by the proposed protected areas relative to the existing protected areas.
- Proportional representation of features that typify the Island of Newfoundland and its natural regions.
- Overlap with protected areas of other features of conservation interest:
 - Broadly occurring mammals (marten, caribou).
 - Wetlands.
 - Measures of ecological intactness/naturalness.

The chosen input datasets and the proportional representation methods used here are based largely on the work of the Newfoundland Regional Working Group of the Canadian Boreal Forest Agreement (NRWG, 2017a). We gratefully acknowledge their work, including signatories Corner Brook Pulp and Paper Limited and Canadian Parks and Wilderness Society, and the process advisors and facilitators.

2.1. Representation

Representation analysis is a well-established tenet of systematic conservation planning (Groves, 2003; Margules and Pressey, 2000) whereby an explicit goal is ensuring protected areas capture desired aspects of biodiversity (Olson and Dinerstein, 1998; Noss and Cooperrider, 1994). Many representation analyses are based on percentage or area targets established through political and/or scientific decision-making processes (Leroux et al., 2006).

Our analyses do not measure against per-feature percentage or area targets, because none have been established for the province. Instead, we first measure and report the representation percentage improvement of features in proposed protected areas relative to existing protected areas.

We then measure and report proportional representation (NRWG, 2017b; BEACONS, 2008), which calculates the proportion of each class of each feature (input dataset) within existing and proposed protected areas, and compares it to the proportion of the that feature with a reference area (Island-wide, Ecoregion, Subregion). Features which occur in greater proportion within protected areas than within the reference area are considered to be well represented. Features which occur in lesser proportion within protected areas than within the reference area are considered to be under-represented. This approach does not attempt to assess if representation targets have been achieved, though it does quantify the features at Island-wide, Ecoregion, and Subregion scales that can be used to help establish effective representation targets in the future. Assessing proportional representation determines how well existing and proposed protected areas match the composition of the geographic areas in which they occur.

The lists and maps of input features for representation analysis, their data sources and rationale for selection are provided below. Again, it is important to note that this representation analysis does not address the question of “how much is enough”, either from an ecological or political perspective.

2.2. Area of Overlap

This analysis employs a simple spatial intersection to calculate the area of overlap of protected areas with additional broadly occurring features of conservation interest, including species habitat, wetland types, and ecological intactness. Proportional representation is not applied to these features because they do not characterize the variation in the landscape. The lists and maps of additional input features used in area of overlap analysis and their data sources are provided below.

2.3. Input Data

Inputs for the proportional representation analysis have been chosen based on availability of existing datasets to provide a broad-spectrum characterization of the natural environment. We have included both biotic and abiotic features. While use of biotic (living) features in a conservation-oriented representation analysis is intuitive, there is increasing evidence that protecting a diversity of abiotic (non-living) features can help ensure the diversity of living organisms. These surrogates for biodiversity and ecological processes have been termed enduring features (Anderson and Ferree, 2010) or land facets (Beier and Brost, 2010). The importance of representing such features in protected areas may be increasing as climate change accelerates under anthropogenic influence.

All input data are mapped in Appendix A. Note that not all features have full coverage, either due to the nature of the feature or limitations (e.g. scale of mapping) in its spatial representation.

Datasets for representation analyses:

- Land Cover, an amalgamation of multiple datasets (CanVec, 2014; FRI, 2012; HWL, 2011; EOSD, 2000) to provide Island-wide coverage using the best available information for the 7 chosen classes. Land cover is the most visible manifestation of the variety of growing conditions, evolutionary circumstances and resulting vegetation.
- Climate Moisture Index 1981-2010 (CMI, 2018), calculated as the difference between annual precipitation and potential evapotranspiration, divided into five equal-interval classes. The Island of Newfoundland has a generally marine climate, but there is generally wetter to drier pattern going from south to north.
- Projected Climate Moisture Index 2071-2100 (CMI, 2018), divided into five equal-interval classes. These datasets are based on projections of future climate, with scenario 2.6 based on aggressive emissions reduction and scenario 8.5 based on status quo emissions (IPCC, 2019).

- Productivity (Coops et al., 2008), a sum of the fraction of photosynthetically active radiation over time as an indicator of vegetation growth, divided into five equal-interval classes.
- Water Edge Density, a measure of the relative proportion of shoreline/riparian habitat, calculated from 1:50,000 waterbodies and watercourses data (CanVec, 2014) using methods from the Labrador Nature Atlas (Notzl et al., 2013) and divided into five equal-interval classes. Riparian areas are known for their relatively high biodiversity.
- Older Forests (FRI, 2012), defined as stands where the leading tree species are at least 80 years old.
- Leading Tree Species (FRI, 2012), being the most prominent species for each forested stand. The profile of tree species on the Island of Newfoundland is dominated by coniferous (Balsam Fir and Black Spruce), so inclusion of other tree species is an important facet of biodiversity protection.
- Elevation (Geobase, 2014), divided into five equal-interval classes, which is a proxy for localized variation in climate and soil.
- Landforms, derived from elevation (Geobase, 2014), to characterize the shape and repeating patterns of topography, based on work done by the Nature Conservancy of Canada and its partners (Notzl et al., 2013; Anderson et al, 2006). Landforms drive more detailed local variation in growing conditions and other biotic factors than elevation alone.
- Bedrock Geology (DNR, 2014), simplified into seven classes relevant for conservation planning (Edinger, 2014; Hermanutz, 2014). The underlying Geology is an important driver of variations in soil type, acidity and thickness.

Datasets for Area of Overlap analyses:

- Marten Critical Habitat, and Marten Core and Peripheral Areas (The Newfoundland Marten Recovery Team, 2010). These are based on many sources of information and expertise, and used for wildlife and land use management recommendations.
- Caribou Areas of Concern 2010 (DEC, 2010). These are based on many sources of information and expertise, and used for wildlife and land use management recommendations.
- Caribou Year-round Kernels 1979-2014 (Amec Foster Wheeler, 2015). These are the pooled results of decades of collaring and electronically tracking individual animals, primarily by the Department of Environment and Conservation.
- Wetlands (C-CORE, 2020), a prediction of bog, fen, marsh, swamp and shallow water (NWWG, 1997) based on remotely sensed data, with ground truth fieldwork at multiple sites across the province. This dataset was analyzed in areas considered to be wetland in the land cover dataset described above (HWL, 2011).
- Human Footprint (HFI, 2014), a broad-based estimate of relative levels of anthropogenic disturbance using inputs covering human habitation, resource development, human access and electric power.
- Intactness (GFWC, 2013), delineating areas 50 km² or greater with little or no visible evidence of forest harvesting or other anthropogenic disturbances.

- Large Intact Landscape Area (SFMS, 2014), delineating areas of limited anthropogenic disturbance that will be excluded from commercial forest harvesting.
- Benchmark Areas of Interest (NRWG, 2017a; NRWG, 2015), identifying large, intact, hydrologically connected areas of conservation interest. Benchmarks are potential protected areas large enough to withstand common natural disturbances such as forest fires and that provide scientific baselines for studying the impacts of resource management and extraction activities in other similar areas of a landscape (BEACONS, 2017; Schmiegelow, 2007).

All Input Datasets are mapped in Appendix A.

3. Results

The complete set of tabular analysis results are available as Electronic Appendices (link available at the end of this document).

3.1. Percent Protected

The percent protected Island-wide and by Ecoregion and Subregion of the existing and proposed protected areas are summarized in Table 1, Figure 3 and Figure 4.

Table 2 - Percent Protected Island-wide, by Ecoregion and

| | Existing PAs | | Proposed PAs | | EPAs + PPAs | |
|--------------------------------------|--------------|-------|--------------|-------|-------------|-------|
| | | | | | | |
| Island of Newfoundland | 6.7% | | 6.5% | | 13.2% | |
| Strait of Belle Isle | | 2.2% | | 3.0% | | 5.1% |
| Strait of Belle Isle Barrens | | 2.2% | | 3.0% | | 5.1% |
| Northern Peninsula Forest | | 5.7% | | 16.2% | | 21.9% |
| Northern Coastal | | 0.2% | | 5.0% | | 5.1% |
| Beaver Brook Limestone | | 0.2% | | 8.3% | | 8.4% |
| Coastal Plain | | 16.4% | | 2.7% | | 19.2% |
| Eastern Long Range | | 4.1% | | 39.6% | | 43.8% |
| Long Range Barrens | | 9.6% | | 15.6% | | 25.1% |
| Northern Long Range | | 15.7% | | 25.8% | | 41.5% |
| Buchans Plateau-Topsail | | 13.4% | | 0.0% | | 13.4% |
| Southern Long Range | | 0.1% | | 13.4% | | 13.5% |
| North Shore Forest | | 2.2% | | 5.3% | | 7.6% |
| North Shore Forest | | 2.2% | | 5.3% | | 7.6% |
| Central Newfoundland Forest | | 1.8% | | 4.7% | | 6.5% |
| Northcentral | | 1.4% | | 5.5% | | 6.9% |
| Red Indian Lake | | 0.0% | | 0.0% | | 0.0% |
| Portage Pond | | 13.0% | | 4.2% | | 17.2% |
| Twillick Steady | | 1.5% | | 10.7% | | 12.2% |
| Eastern Hyper-Oceanic Barrens | | 2.8% | | 3.3% | | 6.1% |
| Eastern Hyper-Oceanic Barrens | | 2.8% | | 3.3% | | 6.1% |
| Western Newfoundland Forest | | 5.5% | | 3.1% | | 8.6% |
| Serpentine Range | | 16.8% | | 0.0% | | 16.8% |
| Corner Brook | | 5.3% | | 0.0% | | 5.3% |
| Port au Port | | 0.0% | | 4.3% | | 4.3% |
| St. George's Bay | | 1.6% | | 5.3% | | 6.9% |
| Codroy | | 0.0% | | 17.9% | | 17.9% |

| | | | | | | | | | |
|-------------------------|--|-------|-------|--|-------|-------|--|-------|-------|
| Bay d'Espoir | | | 1.7% | | | 0.0% | | | 1.7% |
| Maritime Barrens | | 10.6% | | | 3.0% | | | 13.7% | |
| Northeastern Barrens | | | 0.7% | | | 4.5% | | | 5.3% |
| Central Barrens | | | 18.1% | | | 0.6% | | | 18.7% |
| South Coast Barrens | | | 1.5% | | | 9.8% | | | 11.3% |
| Southeastern Barrens | | | 11.3% | | | 0.1% | | | 11.4% |
| Avalon Forest | | 2.6% | | | 14.5% | | | 17.0% | |
| Avalon Forest Subregion | | | 2.6% | | | 14.5% | | | 17.0% |

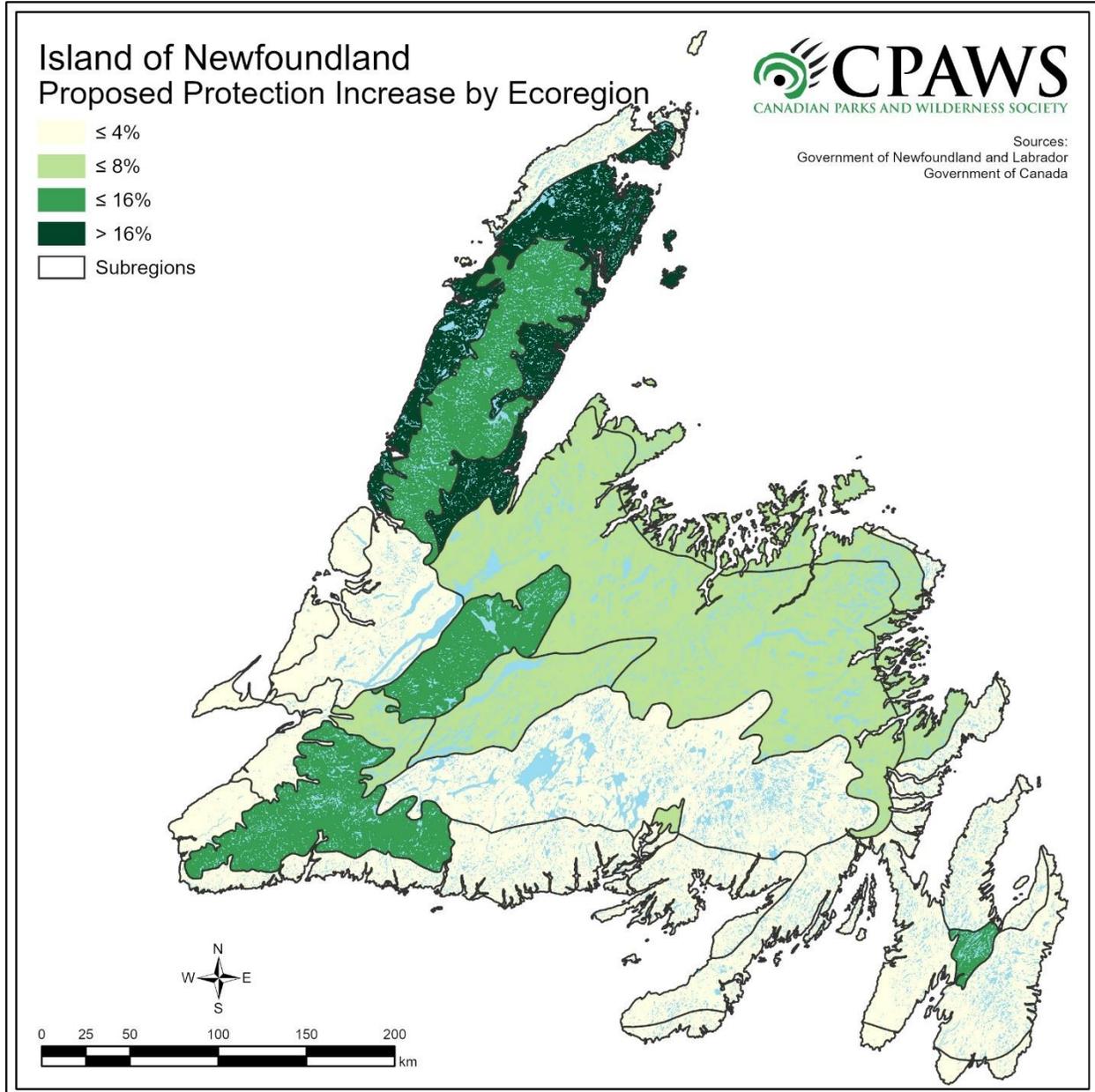


Figure 3 - Proposed Protection Increase by Ecoregion

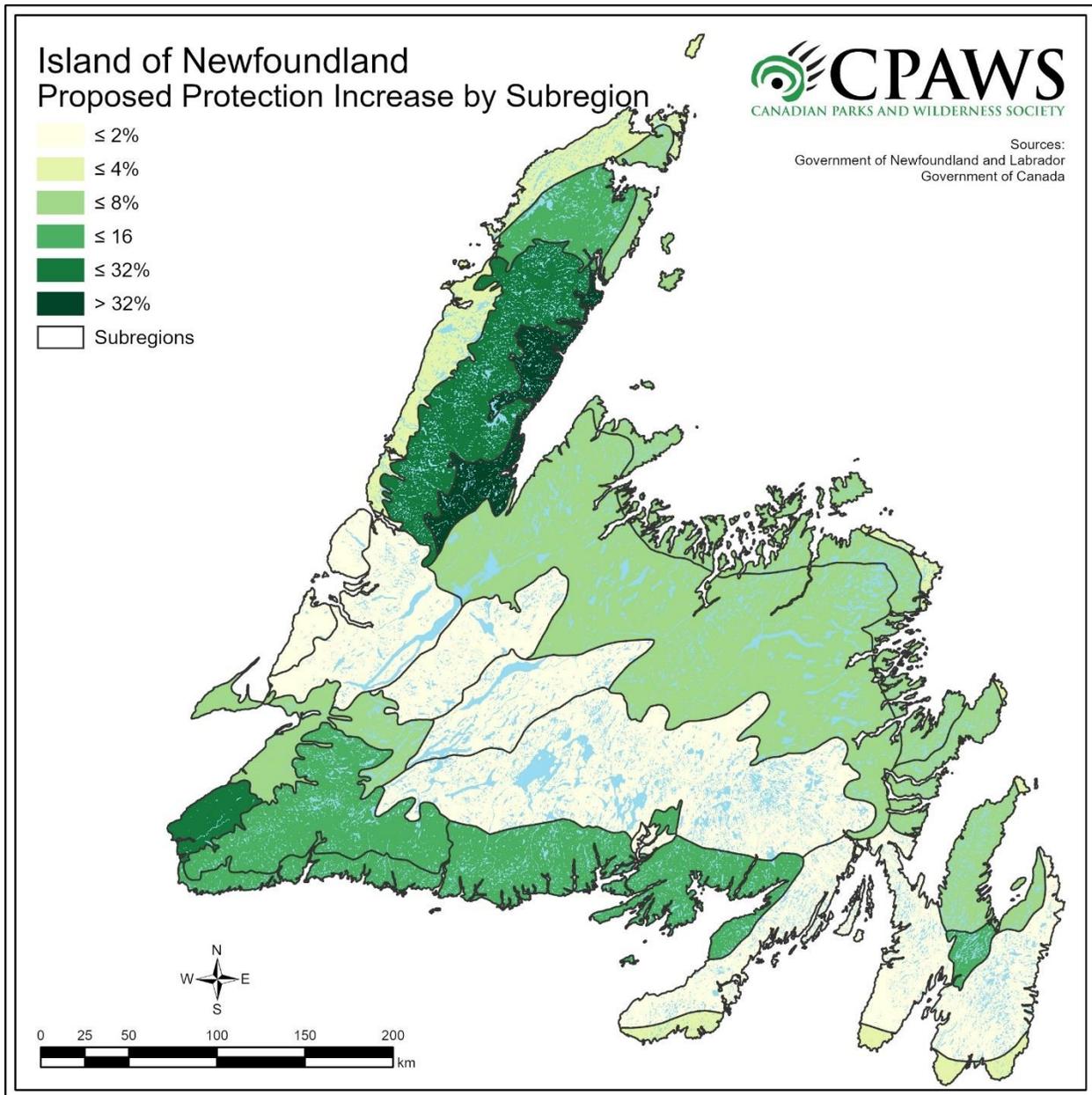


Figure 4 - Proposed Protection Increase by Subregion

Targets for minimum areas protected have been established internationally at 17% by 2020 (CBD, 2012) and nationally at 25% by 2025 and 30% by 2030 (CPAWS, 2020; ECCC, 2020). Overall, the proposed protection falls short of these national/international area targets based on political consensus, even on the Island where it almost doubles the coverage to over 13%. The following ecosystems will continue to have lower proportions of protection than the Island overall (ecoregion/subregion maps are provided in Appendix B):

- Strait of Belle Isle ecoregion

- Northern Peninsula Forest ecoregion
 - Northern Coastal subregion
 - Beaver Brook Limestone subregion
- North Shore Forest ecoregion
- Central Newfoundland Forest ecoregion
 - Northcentral subregion
 - Red Indian Lake subregion
 - Twillick Steady subregion
- Eastern Hyper-Oceanic Barrens ecoregion
- Western Newfoundland Forest ecoregion
 - Corner Brook subregion
 - Port au Port subregion
 - St. George’s Bay subregion
 - Bay d-Espoir subregion
- Maritime Barrens ecoregion
 - Northeastern Barrens subregion
 - South Coast Barrens subregion
 - Southeastern Barrens subregion

Some of the subregion protected area shortfalls could potentially be addressed by considering former large provincial parks (Wikipedia, 2020) for protection. One example is the former Stag Lake Provincial Park in the Corner Brook subregion (Ballam, 2014).

Province-wide, the proposed protected areas would bring the protected areas coverage from approximately 6.8% to about 8.5%. Labrador (currently at almost 7% protection) has unique a context, but it will continue to fall further behind commitments and other jurisdictions unless similar efforts to establish new protected areas are made.

3.2. Representation Improvements

Many features will be well-represented if the proposed protected areas are adopted. Island-wide, the coverage of the features highlighted in Table 3 will be substantially improved.

Table 3 - Selected Island-wide Representation Improvements

| Feature | Class | Protection Increase |
|----------------------------------|------------------------|---------------------|
| Land Cover | Shrub/Herb | 219% |
| | Rock/Barren/Non-forest | 182% |
| | Mixedwood | 149% |
| | Broadleaf | 138% |
| Climate Moisture Index | Lower | 129% |
| | Lower-Mid | 313% |
| Projected Climate Moisture Index | Lower | 201/532% |
| | Lower-Mid | 287/289% |
| | Higher | 803/137% |
| Productivity | Lower-Mid | 120% |
| | Mid-Higher | 85% |

| | | |
|----------------------|-----------------------------|------|
| Older Forests | | 171% |
| Leading Tree Species | Yellow Birch | 707% |
| Elevation | Lower | 100% |
| | Mid | 288% |
| Landforms | Hill | 130% |
| | N-facing Upper Sideslope | 115% |
| | S-facing Upper Sideslope | 97% |
| | Dry Flat | 93% |
| | Wet Flat | 89% |
| | Valley/Toe Slope | 126% |
| | N-facing Lower Sideslope | 106% |
| Simplified Geology | S-facing Lower Sideslope | 91% |
| | Acidic Granitic | 119% |
| | Mafic/Intermediate Granitic | 116% |
| | Calcareous | 163% |

Representation improvements in proposed protected areas include:

- Relatively drier areas, especially in the proposed protected areas in Central Newfoundland and on the Northern Peninsula.
- Lower and mid elevation areas (all proposed protected areas in the Central Newfoundland Forest, Maritime Barrens and Avalon Forest ecoregions) and flatter/gentler landforms, especially in the Central Newfoundland Forest ecoregion (Stony Lake, Rodney Pond, Gambo Pond and Banting Lake proposed protected areas, Figure 5). This is noteworthy given the coverage of higher elevation areas and extreme slopes in existing protected areas such as Gros Morne National Park.
- Calcareous (less acidic) geology, in the Cape Norman, Watts Point Extension, Boiling Brook, Cloud River, Soufflet’s River, Spirit Cove and Cape St. George proposed protected areas.

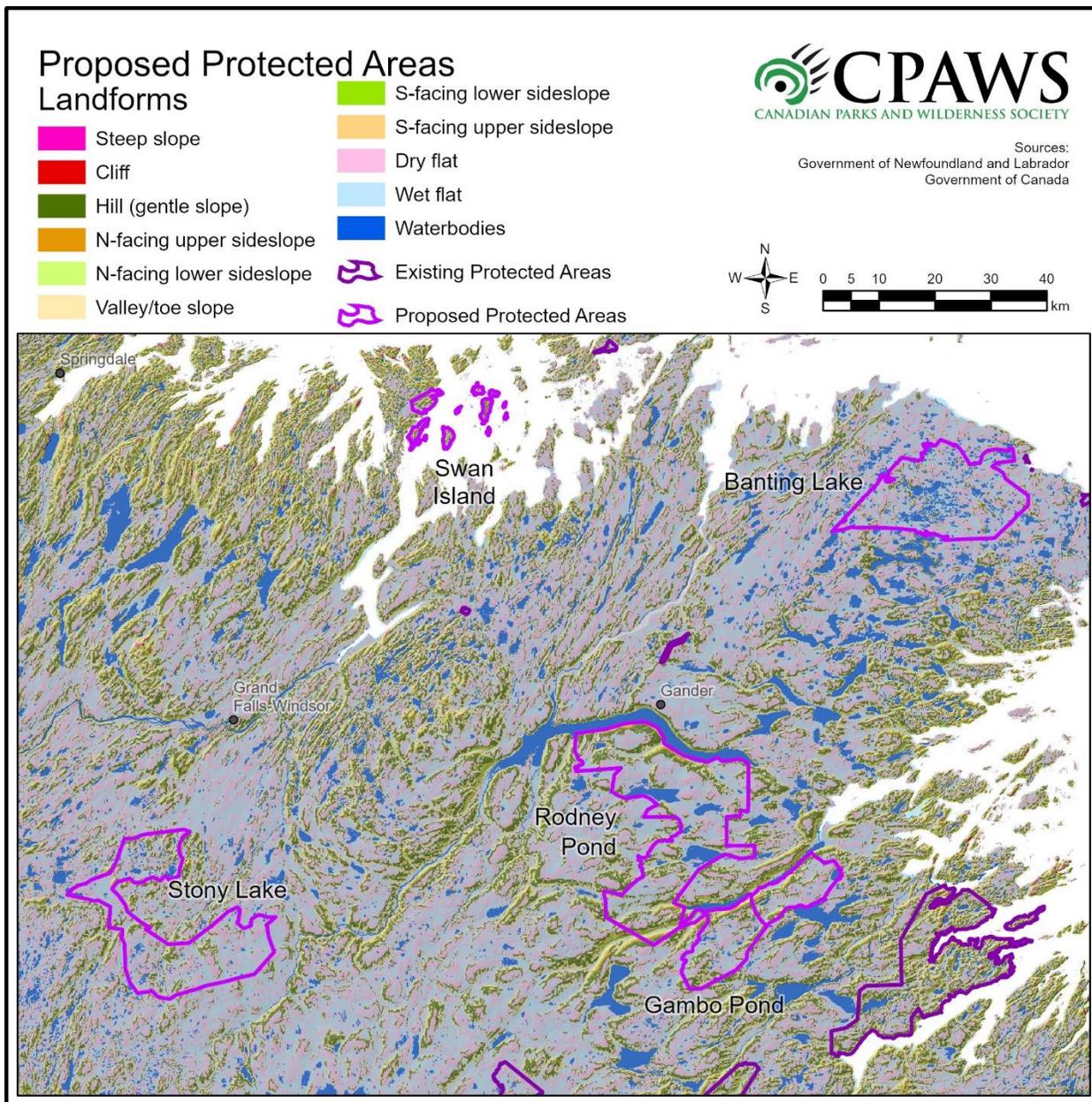


Figure 5 - Landforms in Central Newfoundland

By ecoregion, the list of representation improvements is long, so those with at least 200% improvement are presented in Appendix C. From a biodiversity and conservation planning perspective, noteworthy representation improvements include:

- Older forests in Central Newfoundland (Stony Lake, Rodney Pond and Gambo Pond proposed protected areas) and on the Northern Peninsula (Mare Cove, Highlands of St. John, Cloud River, Soufflet’s River and Little Cat Arm proposed protected areas).

- Higher productivity sites in the Central Newfoundland Forest ecoregion (Banting Lake, Rodney Pond and Gambo Pond proposed protected areas).
- Wetlands in the North Shore Forest ecoregion (Banting Lake proposed protected area) and Avalon Forest ecoregion (Halls Gullies and Ripple Pond proposed protected areas).
- Yellow Birch in the Western Newfoundland Forest, largely in the Cape John proposed protected area.

Many other features in the Northern Peninsula Forest, Long Range Barrens, Central Newfoundland Forest, North Shore Forest and Avalon Forest ecoregions would have representation improvements due to the proposed substantial increase in protection in those areas.

3.3. Proportionally Well-represented Features

As introduced earlier, it is also important to consider proportional representation by comparing the proportion of input data features/classes within protected areas to their proportions in the larger landscapes. Note that even as new protected areas are added, the proportions of features can go down. Table 4 Presents selected well-represented features and the Island-wide and ecoregion scales. The full set of results, including by subregion, are available in the Electronic Appendices linked at the end of this document.

Table 4 - Selected Proportionally Well-represented Features

| Feature | Class | Island | Proportional Occurrence of Feature/Class | | | |
|--------------------|-------------|--------|------------------------------------------|-------|-----------|-------|
| | | | Ecoregion | EPAs | EPAs+PPAs | |
| Land Cover | Wetlands | 15.6% | | | | |
| | | | Strait of Belle Isle | 23.2% | 32.5% | 34.7% |
| | | | Northern Peninsula Forest | 10.8% | 19.1% | 8.9% |
| | | | Maritime Barrens | 18.6% | 24.1% | 21.7% |
| | | | Avalon Forest | 13.1% | 17.3% | 14.2% |
| Land Cover | Shrub/Herb | 12.8% | | | | |
| | | | Northern Peninsula Forest | 26.8% | 11.9% | 32.8% |
| | | | Long Range Barrens | 21.8% | 15.3% | 23.5% |
| | | | Western Newfoundland Forest | 8.9% | 3.3% | 12.1% |
| | | | Avalon Forest | 26.1% | 25.0% | 27.0% |
| Land Cover | Coniferous | 42.1% | | | | |
| | | | Northern Peninsula Forest | 41.1% | 52.8% | 40.5% |
| | | | Long Range Barrens | 31.5% | 50.7% | 34.5% |
| | | | North Shore Forest | 52.0% | 75.0% | 54.3% |
| | | | Central Newfoundland Forest | 50.7% | 54.0% | 48.4% |
| | | | Eastern Hyper-Oceanic Barrens | 35.8% | 46.2% | 39.4% |
| | | | Western Newfoundland Forest | 48.0% | 59.7% | 47.4% |
| Water Edge Density | Mid to High | 0.1% | | | 0.4% | 0.2% |
| Older Forests | | 10.5% | | | | |
| | | | Northern Peninsula Forest | 24.2% | 3.9% | 26.7% |
| | | | Long Range Barrens | 9.0% | 18.3% | 31.7% |
| | | | Avalon Forest | 0.6% | 2.8% | 17.6% |
| Landforms | Steep slope | 1.6% | | | | |
| | | | Northern Peninsula Forest | 1.8% | 4.9% | 3.8% |

| | | | | | | |
|------------------|------------|-------|-----------------------------|--------|--------|--------|
| | | | Long Range Barrens | 2.1% | 6.0% | 3.1% |
| | | | Western Newfoundland Forest | 6.4% | 16.2% | 16.0% |
| Landforms | Cliff | 0.4% | | | 1.6% | 1.1% |
| | | | Northern Peninsula Forest | 0.6% | 3.4% | 1.8% |
| | | | Long Range Barrens | 0.8% | 3.8% | 1.6% |
| | | | Western Newfoundland Forest | 1.7% | 7.1% | 5.6% |
| Elevation | Higher | 0.3% | | | 3.5% | 1.7% |
| | | | Long Range Barrens | 1.6% | 14.8% | 5.6% |
| | | | Western Newfoundland Forest | 0.9% | 3.7% | 2.4% |
| Climate Moisture | Mid-Higher | 17.0% | | | 25.4% | 22.6% |
| | | | Long Range Barrens | 10.0% | 4.6% | 20.4% |
| | | | Western Newfoundland Forest | 15.2% | 1.8% | 17.9% |
| | | | Maritime Barrens | 36.5% | 43.0% | 40.2% |
| | | | Avalon Forest | 100.0% | 100.0% | 100.0% |

The following are examples of proportionally well-represented features:

- Wetlands (e.g. Bras Mort Bog and Barachois South proposed protected areas), coniferous forests (e.g. Soufflet’s River, Gambo Pond and Random Island proposed protected areas) and shrub/herb (e.g. Little Cat Arm and Cape John proposed protected areas).
- Mid to higher water edge density areas (those with high riparian-ness based on the presence of water bodies with complex shorelines or braided rivers/streams), most notably in the existing Bay du Nord Wilderness Reserve and the Banting Lake Proposed Reserve.
- Proposed PAs address the under-representation gap in older forests, especially in the Avalon Forest ecoregion (Halls Gullies and Ripple Pond proposed protected areas) and on the Northern Peninsula (Figure 5).
- Steep slopes, cliffs and higher elevation areas generally are well-represented, especially in Western Newfoundland.
- Areas of mid to higher climate moisture are well-represented, especially in the Southern and Eastern Newfoundland. The same holds true in end-of-century projections, which are not shown in the table.

Proposed Protected Areas Older Forests



-
- Proposed Protected Areas
- Existing Protected Areas

Sources:
Government of Newfoundland and Labrador
Government of Canada

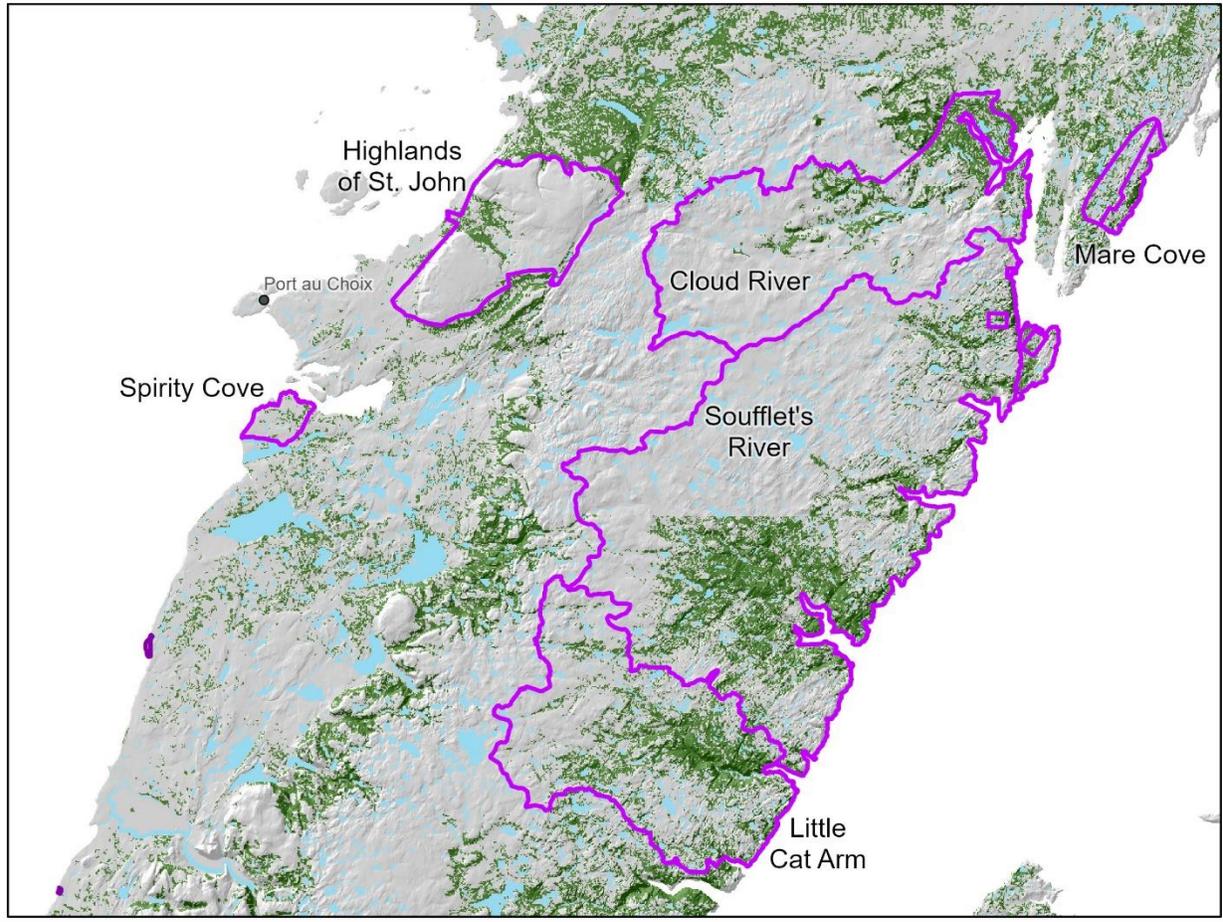


Figure 6 - Older Forests on the Northern Peninsula

3.4. Proportional Representation Gaps

Table 5 presents selected proportional representation gaps.

Table 5 - Selected Proportionally Under-represented Features

| Feature | Class | Proportional Occurrence of Feature/Class | | | | |
|------------|-----------|------------------------------------------|-------------------------------|------|------|-----------|
| | | Island | Ecoregion | | EPAs | EPAs+PPAs |
| Land Cover | Broadleaf | 0.9% | | | 0.3% | 0.3% |
| | | | North Shore Forest | 1.6% | 0.1% | 0.3% |
| | | | Central Newfoundland Forest | 2.1% | 0.6% | 0.9% |
| | | | Eastern Hyper-Oceanic Barrens | 1.4% | 1.4% | 0.7% |

| | | | | | | |
|--------------|------------|-------|-------------------------------|-------|--------|-------|
| | | | Western Newfoundland Forest | 1.5% | 1.4% | 1.9% |
| Land Cover | Mixedwood | 3.5% | | | 1.2% | 1.5% |
| | | | Northern Peninsula Forest | 2.4% | 1.6% | 1.9% |
| | | | Long Range Barrens | 1.2% | 1.1% | 1.0% |
| | | | North Shore Forest | 9.9% | 0.2% | 2.2% |
| | | | Central Newfoundland Forest | 5.2% | 2.7% | 2.4% |
| | | | Eastern Hyper-Oceanic Barrens | 2.1% | 2.3% | 1.7% |
| | | | Western Newfoundland Forest | 9.0% | 6.4% | 7.3% |
| | | | Maritime Barrens | 1.2% | 0.2% | 0.4% |
| | | | Avalon Forest | 1.1% | 1.2% | 0.7% |
| Productivity | Higher | 1.1% | | | 0.1% | 0.3% |
| | | | North Shore Forest | 1.7% | 0.0% | 0.0% |
| | | | Central Newfoundland Forest | 2.4% | 0.2% | 1.7% |
| | | | Western Newfoundland Forest | 0.9% | 0.1% | 0.1% |
| | | | Avalon Forest | 1.0% | 0.0% | 0.0% |
| Landforms | Hill | 18.2% | | | 14.9% | 17.3% |
| | | | Northern Peninsula Forest | 16.5% | 13.9% | 19.1% |
| | | | Long Range Barrens | 21.6% | 17.0% | 21.3% |
| | | | North Shore Forest | 18.1% | 23.2% | 12.1% |
| | | | Western Newfoundland Forest | 17.2% | 11.6% | 13.9% |
| | | | Maritime Barrens | 17.6% | 13.8% | 14.5% |
| | | | Avalon Forest | 19.3% | 15.3% | 18.9% |
| Landforms | Dry Flat | | Northern Peninsula Forest | 19.5% | 15.8% | 13.1% |
| | | | Long Range Barrens | 14.2% | 7.1% | 12.1% |
| | | | Western Newfoundland Forest | 10.1% | 3.6% | 6.3% |
| | | | Central Newfoundland Forest | 22.9% | 15.5% | 23.2% |
| Elevation | Lower | 42.3% | | | 25.0% | 25.3% |
| | | | Northern Peninsula Forest | 62.2% | 68.2% | 36.5% |
| | | | Long Range Barrens | 2.0% | 2.2% | 1.5% |
| | | | Eastern Hyper-Oceanic Barrens | 97.9% | 100.0% | 93.1% |
| | | | Western Newfoundland Forest | 37.2% | 30.0% | 29.2% |
| | | | Maritime Barrens | 39.4% | 19.7% | 20.4% |
| Elevation | Lower-Mid | | Central Newfoundland Forest | 43.8% | 14.0% | 38.8% |
| Geology | Calcareous | 5.1% | | | 1.6% | 2.1% |
| | | | Northern Peninsula Forest | 31.4% | 4.8% | 7.8% |
| | | | Long Range Barrens | 0.2% | 0.0% | 0.0% |
| | | | Western Newfoundland Forest | 16.0% | 10.8% | 8.6% |

The following are examples of proportionally under-represented features:

- Broadleaf and Mixedwood forests, including in the ecoregions where they occur most (North Shore Forest, Central Newfoundland Forest, Western Newfoundland Forest).
- More productive (higher greenness) areas, including in the Western Newfoundland Forest and Central Newfoundland Forest ecoregions, although proposed protected areas are helping close the gap in the Central Newfoundland Forest ecoregion.
- Flat, dry areas, gentle hills and lower to lower-mid elevation areas. This reflects the common bias in earlier protected areas in many jurisdictions toward rugged, less accessible terrain. Again, note that the proposed protected areas in the Central Newfoundland Forest ecoregion will close the gap there (see Figure 5 above). Also note that for some features (such as lower elevations areas in the Northern Peninsula Forest), the addition of protected areas (in this example predominantly

at higher elevations) causes a formerly proportionally well-represented feature to become under-represented.

- All simplified geology classes except acidic granitic bedrock. Most noteworthy is the uncommon calcareous class in the western ecoregions, which is often associated with rare plants where there is sufficient bedrock exposure.

3.5. Area of Overlap

As introduced in the Analysis Methods above, other features of conservation interest are not appropriate for representation analysis, and are instead analyzed using simple area of overlap. Selected results are presented in Table 6.

Table 6 - Protected Areas Overlap with Selected Features

| Feature | Class | Total (km ²) | EPAs | PPAs | Increase |
|----------------------------------|--------------------------|--------------------------|-------|-------|----------|
| Caribou Year Round (1979-2014) | Primary Areas | 12,480 | 1,129 | 709 | 63% |
| | Secondary Areas | 7,544 | 762 | 436 | 57% |
| | Occupancy Areas | 40,848 | 3,469 | 2,569 | 74% |
| Caribou Area of Concern (2010) | Migration | 2,353 | 73 | 0 | 0% |
| | Calving/Wintering Buffer | 25,253 | 2,921 | 1,322 | 45% |
| | Calving and Wintering | 12,736 | 1,832 | 685 | 37% |
| Marten Critical Habitat | | 6,154 | 1356 | 93 | 7% |
| Marten Core Peripheral | Core | 11,731 | 1,773 | 124 | 7% |
| | Peripheral | 11,331 | 1,592 | 506 | 32% |
| NL Wetlands | Bog | 13,199 | 1112 | 770 | 69% |
| | Fen | 2,265 | 162 | 133 | 82% |
| | Marsh | 200 | 22 | 11 | 47% |
| | Swamp | 171 | 9 | 7 | 77% |
| | Shallow Water | 311 | 50 | 19 | 39% |
| Intact Forest Landscapes >50K ha | | 52,422 | 6,167 | 5,573 | 90% |
| Large Intact Landscape Areas | | 39,268 | 3,837 | 4,393 | 115% |

A species of conservation concern across Canada and on the Island of Newfoundland is Woodland Caribou (*Rangifer tarandus*) (COSEWIC, 2015). As per the Caribou maps in Appendix A, existing protected areas Gros Morne National Park, Bay du Nord Wilderness Reserve and Avalon Wilderness Reserve are important for this species. The proposed protected areas provide some additional protection of Caribou calving and wintering grounds in the Central interior and South Coast region (Stony Lake and Facheaux Bay proposed protected areas, Figure 7) and on the Northern Peninsula (Little Cat Arm, Highlands of St. John and Watt's Point Extension proposed protected areas, Figure 8). The primary mechanism for Caribou habitat and migration protection is perhaps the Large Intact Landscape Area of the 10-year Sustainable Forest Management Strategy (see map in Appendix A), which is overdue for its mid-term review (SFMS, 2014).

Proposed Protected Areas Caribou Areas of Concern 2010



- Migration
- Calving and Wintering Buffer
- Calving and Wintering
- Proposed Protected Areas
- Existing Protected Areas

Sources:
Government of Newfoundland and Labrador
Government of Canada

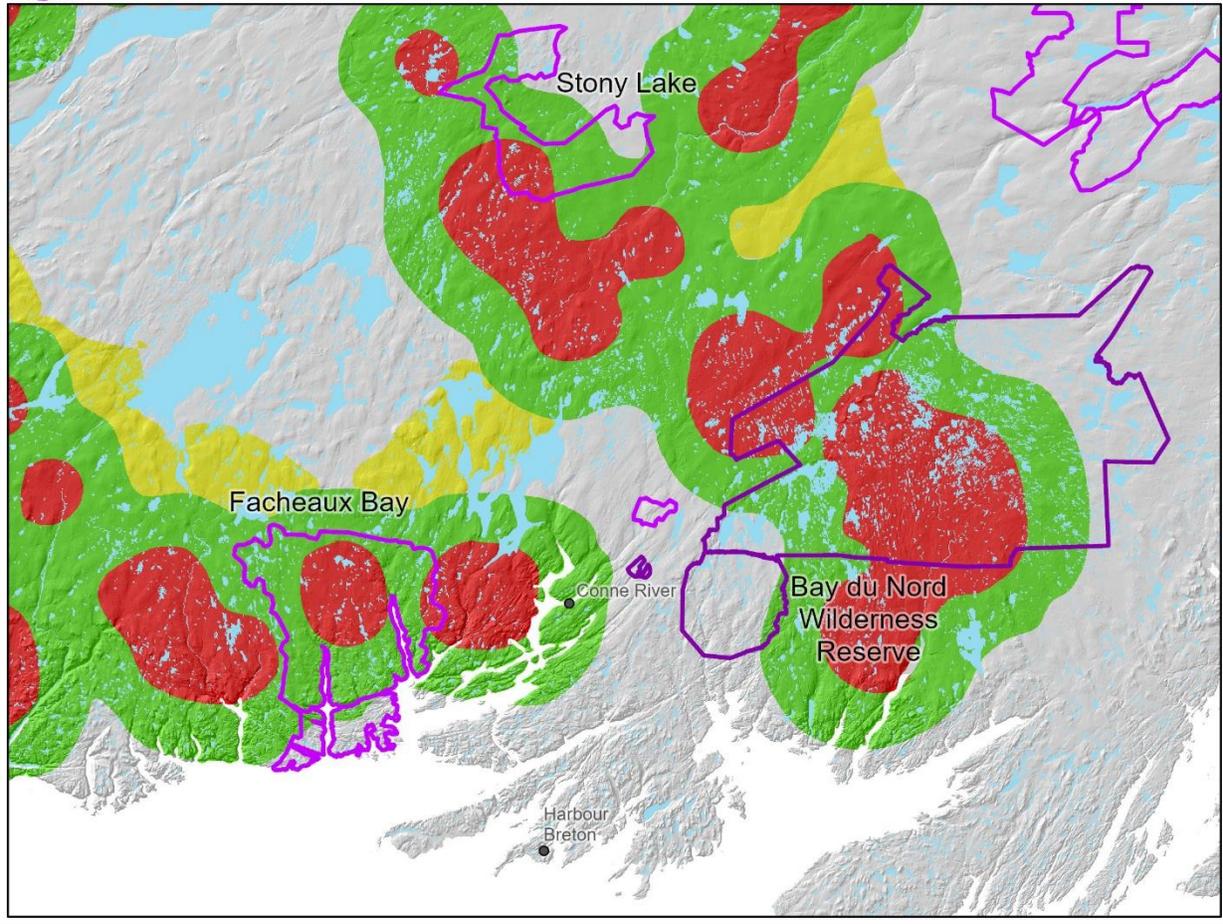
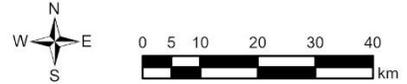


Figure 7 - Caribou Areas in the Central Interior and on the South Coast

Proposed Protected Areas Caribou 1979 to 2014 Year-round Kernels



- Primary Areas
- Secondary Areas
- Occupancy Areas
- Proposed Protected Areas
- Existing Protected Areas

Sources:
Government of Newfoundland and Labrador
Government of Canada

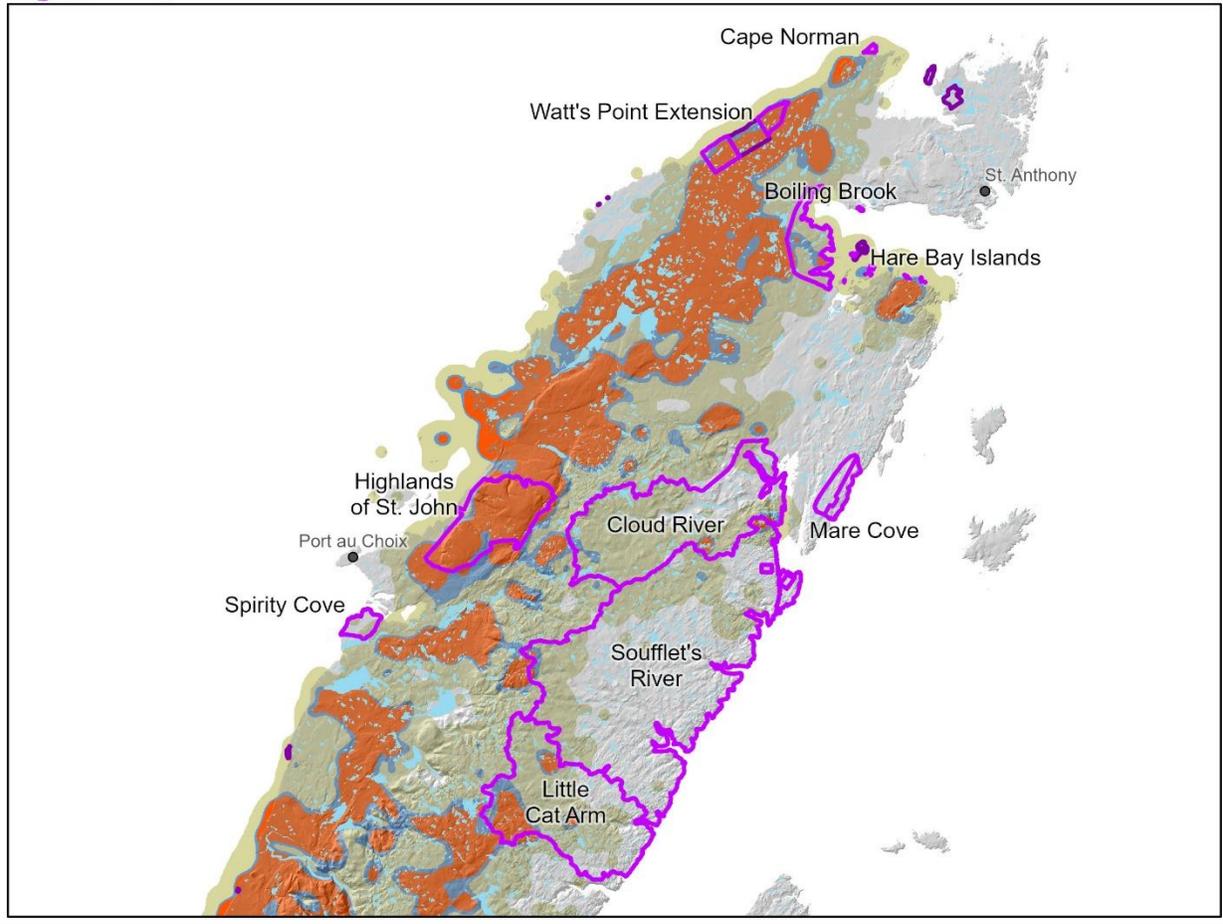
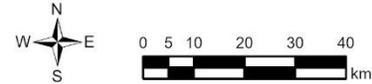


Figure 8 - Caribou Areas on the Tip of the Northern Peninsula

The Newfoundland population of American Marten (*Martes americana atrata*) is an example of a species that has been subject to a multi-pronged conservation effort. This includes extensive study (e.g. Hearn et al., 2010; Hearn, 2007), management and recovery planning (e.g. The Newfoundland Marten Recovery Team, 2010; COSEWIC, 2007) including revision of trapping guidelines for Snowshoe Hare to avoid accidental capture of Marten (DEC, undated), and protected areas establishment (e.g. Little Grand Lake Wildlife Reserve, established 2002), and its situation appears to be stabilized (DEC, undated). As evidenced in the Marten maps in Appendix A and in

Figure 9, Marten habitat is already relatively well protected, with the proposed protected areas offering slight expansion of protection in the northern (Little Cat Arm and Soufflet’s River proposed protected areas), southwestern (Bras Mort Bog and Barachois South proposed protected areas) and eastern (Gambo Pond and Conne River North proposed protected areas) parts of its range.

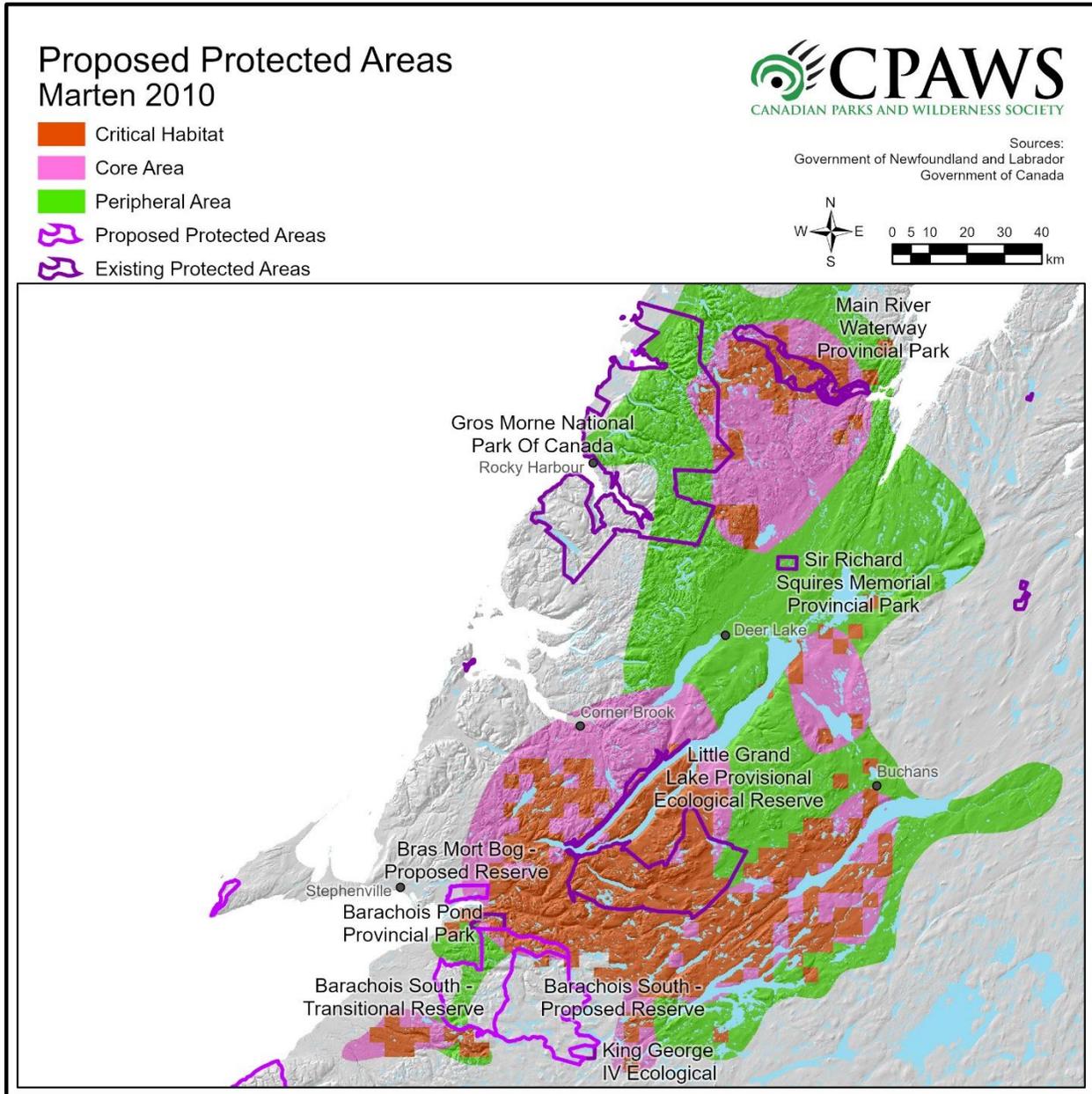


Figure 9 - Marten Areas in Western Newfoundland

All wetland types will see improvements in coverage under the proposed protected area, especially the more common bogs and fens and the less common swamps. In addition to protections for less common wetland types, wetland conservation and

policy needs include identification of important wetlands through continued investment in inventory improvements via remote sensing and field surveys (DUC, 2012) and assessment of the ecosystem services they provide (Adamus, 2018).

As expected, existing and proposed protected areas occur in areas of limited human footprint. For reference, see the Human Footprint (HFI, 2014). Intact Forest Landscapes (GFWC, 2013) and Large Intact Landscape Area (SFMS, 2014) maps in Appendix A. The following proposed protected areas have complete or substantial overlap with these intactness delineations: Highlands of St. John, Cloud River, Soufflet's River, Little Cat Arm, Barachois South, Facheaux Bay, Stony Lake and Banting Lake (GFWC only). Exceptions include the Rodney Pond and Cape John proposed reserves, which is at least partially related to historical industrial logging in Central and Western Newfoundland.

The Canadian Boreal Forest Agreement (CBFA) was a nation-wide initiative involving the forest products industry and environmental organizations that worked to achieve cooperation and mutual support among the signatories. On the Island of Newfoundland, signatories Corner Brook Pulp and Paper Limited and Canadian Parks and Wilderness Society undertook a multi-scale protected area planning process that ultimately led to the permanent deferral of forest harvesting on a substantial proportion of the company's tenure (NRWG, 2017a). An earlier step in the process was an Island-wide analysis to identify opportunities for large, intact, hydrologically connected areas, call "benchmarks" (NRWG, 2015). If protected, benchmarks provide a scientific baseline of comparison for the impacts of development activities in similar areas (BEACONS, 2017; Schmiegelow, 2007). Three large benchmark areas of interest suggested by the CBFA protected areas planning process overlap the Banting Lake, Gambo Pond, Soufflet's River, Cloud River and Highlands of St. John proposed reserves, but additional benchmarks in central, southern and western Newfoundland could be considered for future expansion of the protected areas network (see Figure 10).

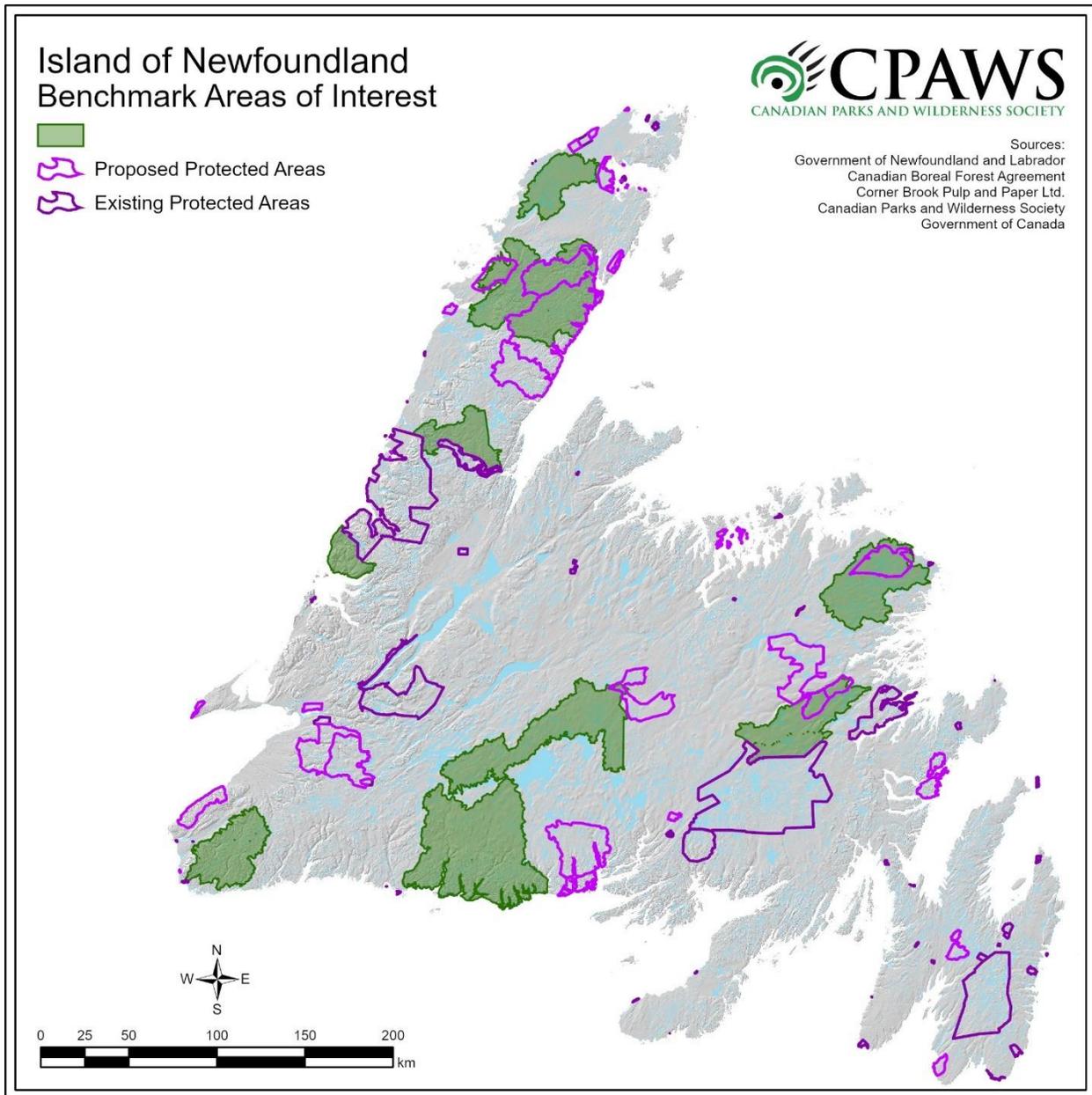


Figure 10 - CBFA Benchmark Areas of Interest

4. Summary

- The NASP 2020 proposed protected areas increase coverage on the Island of Newfoundland from ~6.7% to ~13.2%, with the largest increases in the Northern Peninsula Forest, Long Range Barrens and Avalon Forest ecoregions.
- The following subregions have lower proportions of protection than the Island overall:
 - Strait of Belle Isle Barrens (this ecoregion has no subregions)

- Northern Coastal subregion
- Beaver Brook Limestone subregion
- North Shore Forest (this ecoregion has no subregions)
- Northcentral subregion
- Red Indian Lake subregion
- Twillick Steady subregion
- Eastern Hyper-Oceanic Barrens ecoregion (this ecoregion has no subregions)
- Corner Brook subregion
- Port au Port subregion
- St. George's Bay subregion
- Bay d-Espoir subregion
- Northeastern Barrens subregion
- South Coast Barrens subregion
- Southeastern Barrens subregion
- Proposed protected areas will improve representation of many features including:
 - Relatively drier areas.
 - Lower and mid elevation areas and flatter/gentler landforms.
 - Calcareous (less acidic) geology.
 - Older forests.
 - Higher productivity areas.
 - Rock/barren/non-forest, shrub/herb, mixedwood and deciduous land cover, including Yellow Birch.
- Features with proportional representation gaps in one or more ecoregions include:
 - Broadleaf and mixedwood land cover.
 - Higher productivity areas.
 - Dry flat and gentle hill landforms.
 - Lower and lower-mid elevations.
 - All simplified geology classes except acidic granitic bedrock, and especially calcareous geology.
- Former large provincial parks could be used to potentially fill protection and representation gaps in some subregions. For instance, the former Stag Lake Provincial Park in the Corner Brook subregion contains productive, older coniferous forests and American Marten habitat.
- Species of conservation concern Woodland Caribou would see additional habitat protection from the proposed protected areas, whereas American Marten habitat is already relatively well protected but would see some benefit.
- Most NASP sites are in areas of relatively high intactness. Recognition of the importance of intact landscapes for effective biodiversity protection needs to continue through processes such as the provincial Sustainable Forest Management Strategy. The CBFA Benchmark Areas of Interest suggest additional intact areas that could help achieve protection targets.
- NASP sites and their noteworthy features include:

- Cape Norman, Watts Point Extension, Boiling Brook, Spirit Cove and Cape St. George, limestone barrens sites that would protect under-represented calcareous geology, shrub/herb land cover and lower elevations.
- Mare Cove, Highlands of St. John, Cloud River, Soufflet's River and Little Cat Arm, primarily for relatively drier areas and older forests, as well as Woodland Caribou in some of the areas.
- Bras Mort Bog and Barachois Pond, primarily for Woodland Caribou, American Marten, gentler landforms, wetlands and shrub/herb land cover.
- Cape John, primarily for Yellow Birch and shrub/herb land cover.
- Stony Lake, primarily for Woodland Caribou, lower elevations, flatter landforms and older forests.
- Conne River North, primarily for American Marten, older forests and relatively productive sites.
- Facheax Bay, primarily for Woodland Caribou, lower elevations, wetlands, shrub/herb and coniferous land cover.
- Banting Lake and Rodney Pond, primarily for lower elevations, flatter areas, and relatively productive sites.
- Gambo Pond, primarily for American Marten, lower elevations, flatter areas, older forests and relatively productive coniferous sites.
- Random Island, primarily for lower elevations and relatively productive coniferous forests.
- Halls Gullies and Ripple Pond, primarily for wetlands, shrub/herb and older coniferous forests.
- St. Shott's, primarily for lower elevations and wetlands.
- Continued attention needs to be paid to site-specific protection for fine-scale features including uncommon flora, critical habitats and special wetlands, which are beyond the scope of the analyses in this report.
- Explicit targets for overall and feature-specific protection should be developed to guide future protected areas planning and implementation. A broad base of input for such a process would be also help build understanding of protected areas generally.

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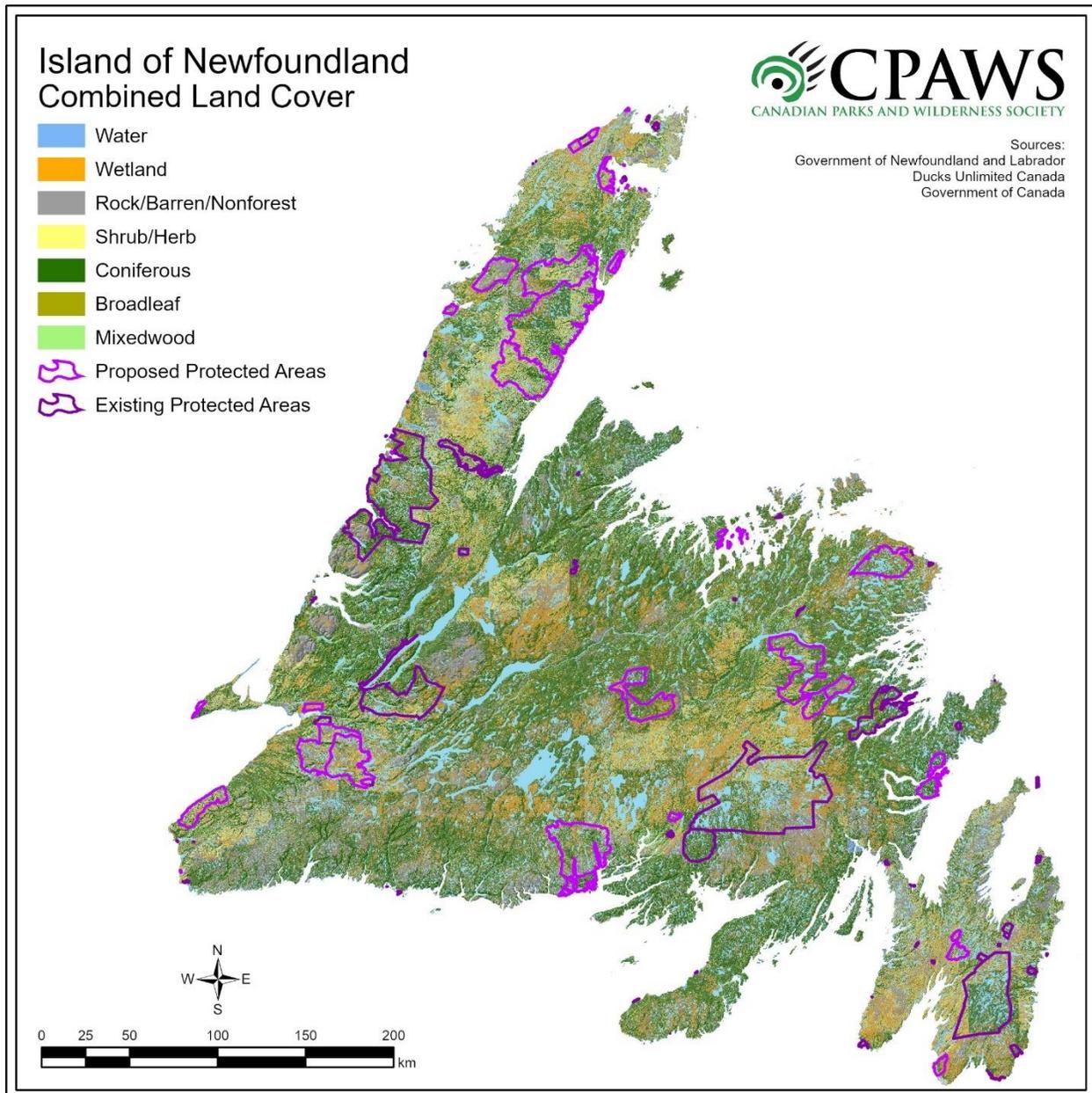
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Appendix A - Input Data Maps

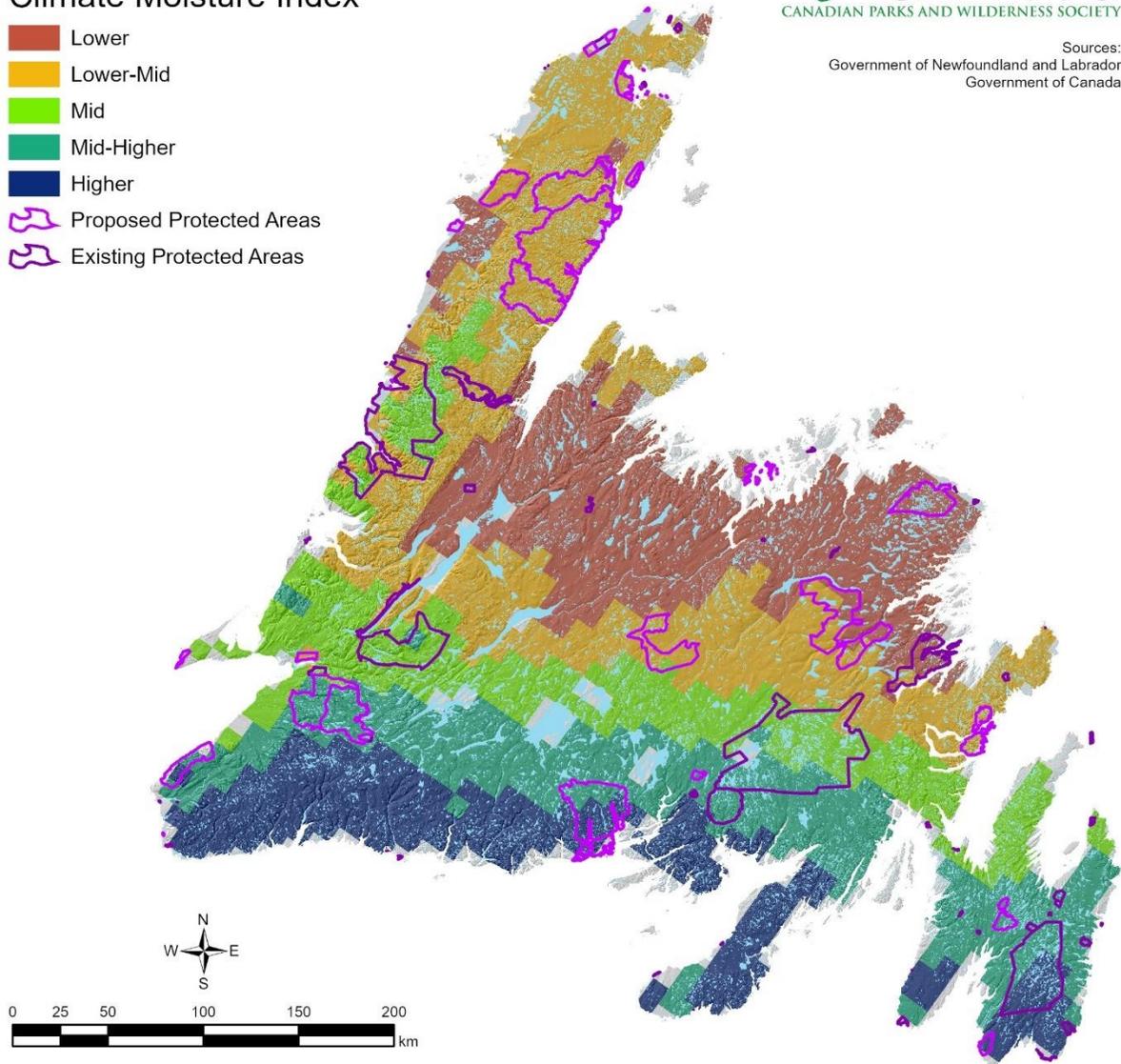


Island of Newfoundland Climate Moisture Index

- Lower
- Lower-Mid
- Mid
- Mid-Higher
- Higher
- Proposed Protected Areas
- Existing Protected Areas



Sources:
Government of Newfoundland and Labrador
Government of Canada

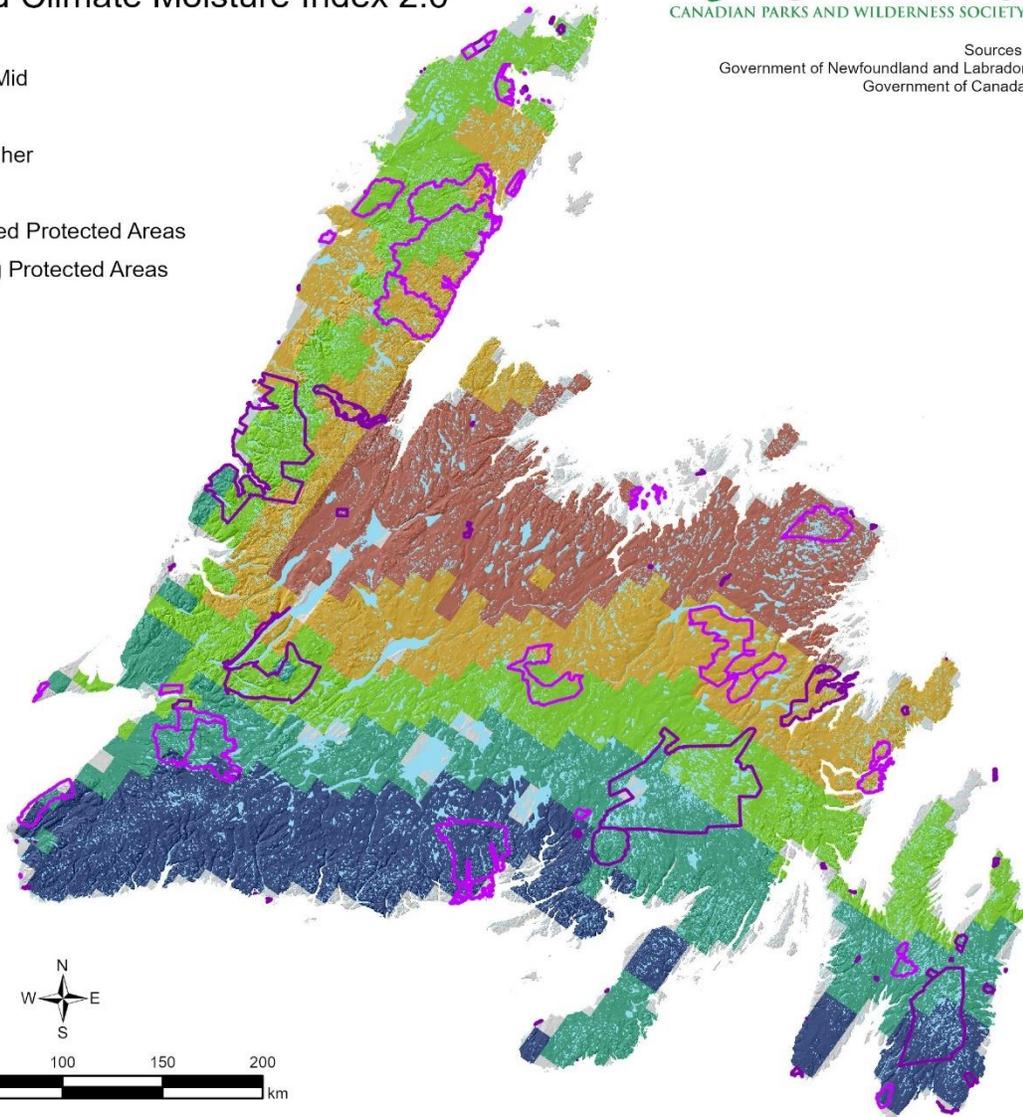


Island of Newfoundland Projected Climate Moisture Index 2.6



Sources:
Government of Newfoundland and Labrador
Government of Canada

- Lower
- Lower-Mid
- Mid
- Mid-Higher
- Higher
- Proposed Protected Areas
- Existing Protected Areas

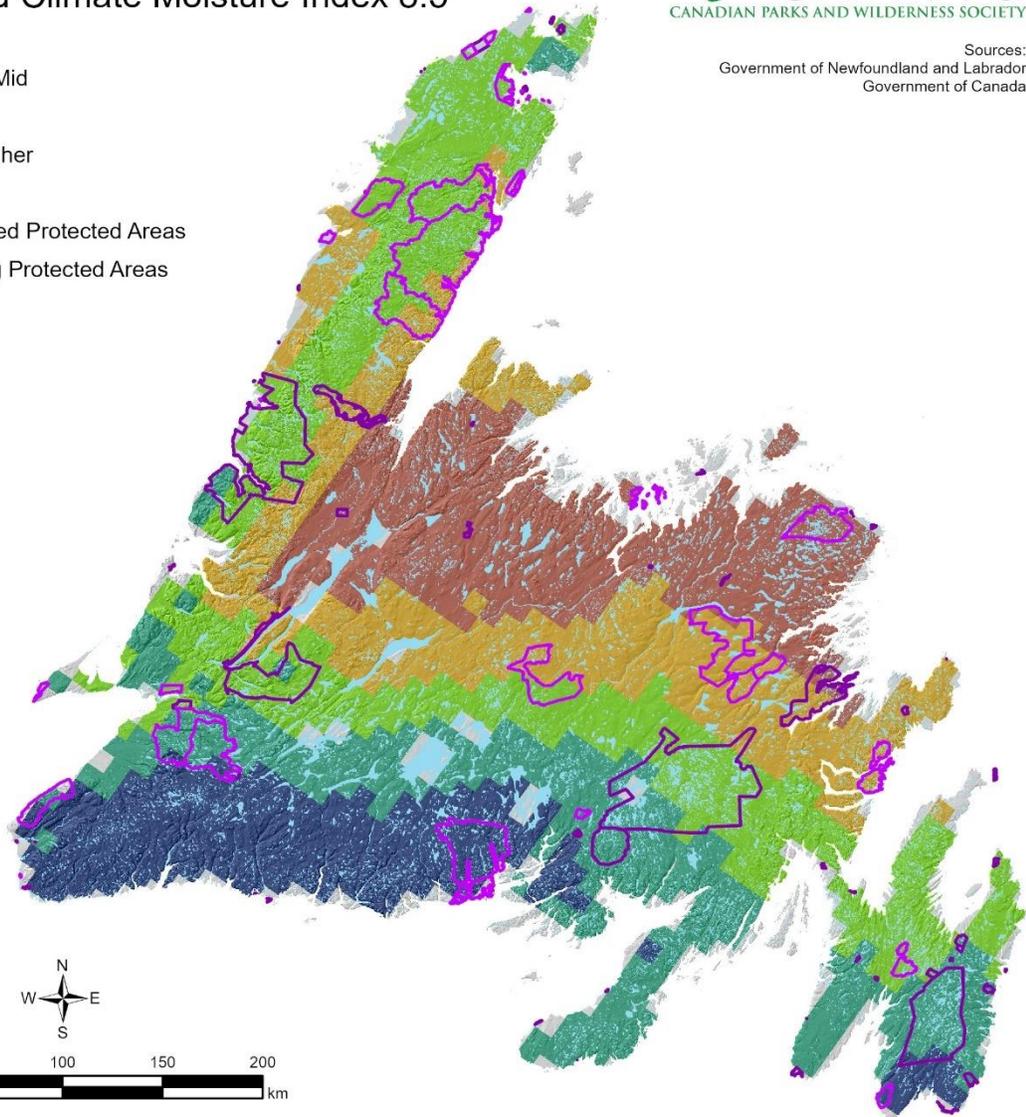


Island of Newfoundland Projected Climate Moisture Index 8.5



Sources:
Government of Newfoundland and Labrador
Government of Canada

- Lower
- Lower-Mid
- Mid
- Mid-Higher
- Higher
- Proposed Protected Areas
- Existing Protected Areas

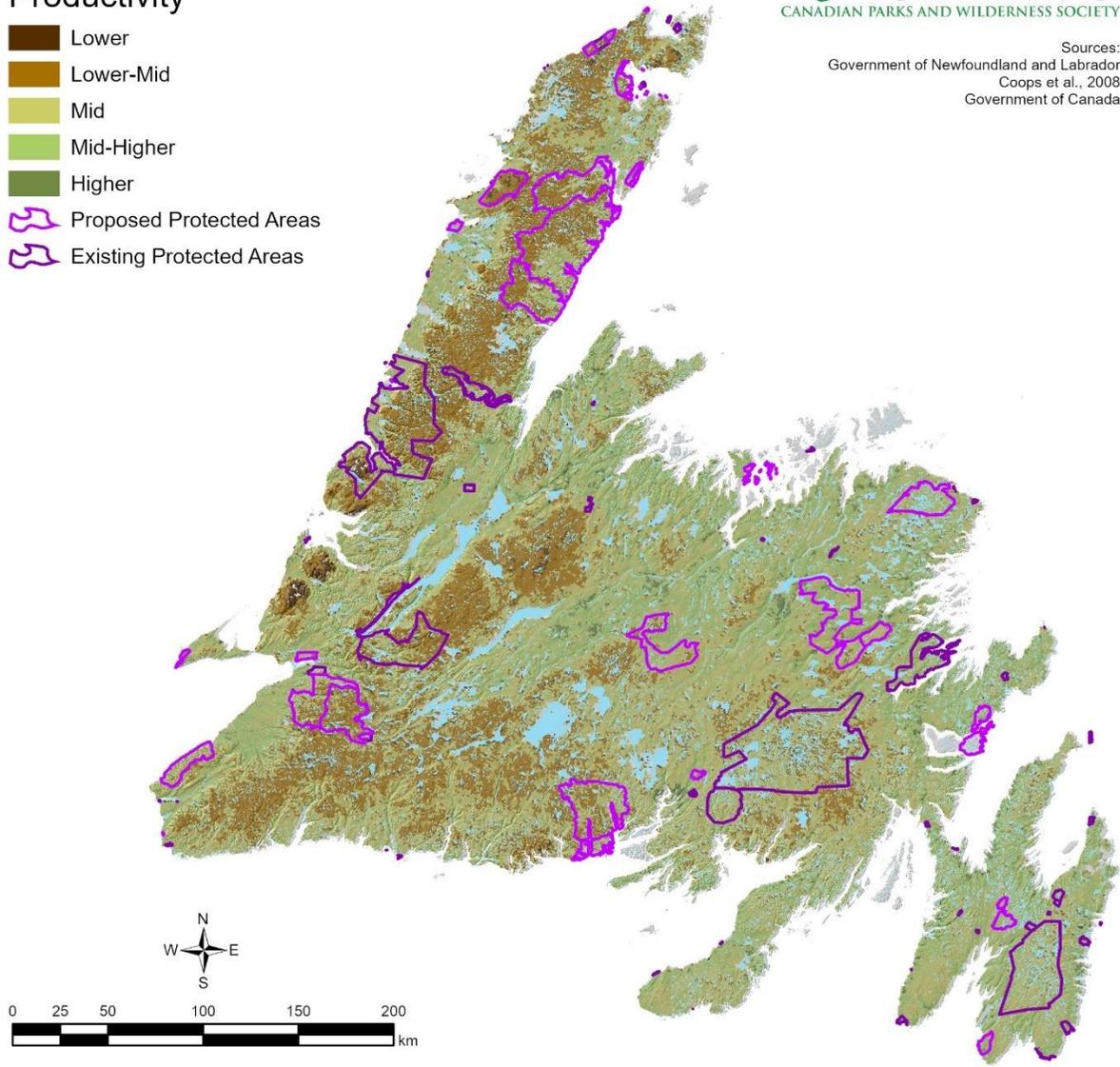


Island of Newfoundland Productivity

- Lower
- Lower-Mid
- Mid
- Mid-Higher
- Higher
- Proposed Protected Areas
- Existing Protected Areas



Sources:
Government of Newfoundland and Labrador
Coops et al., 2008
Government of Canada

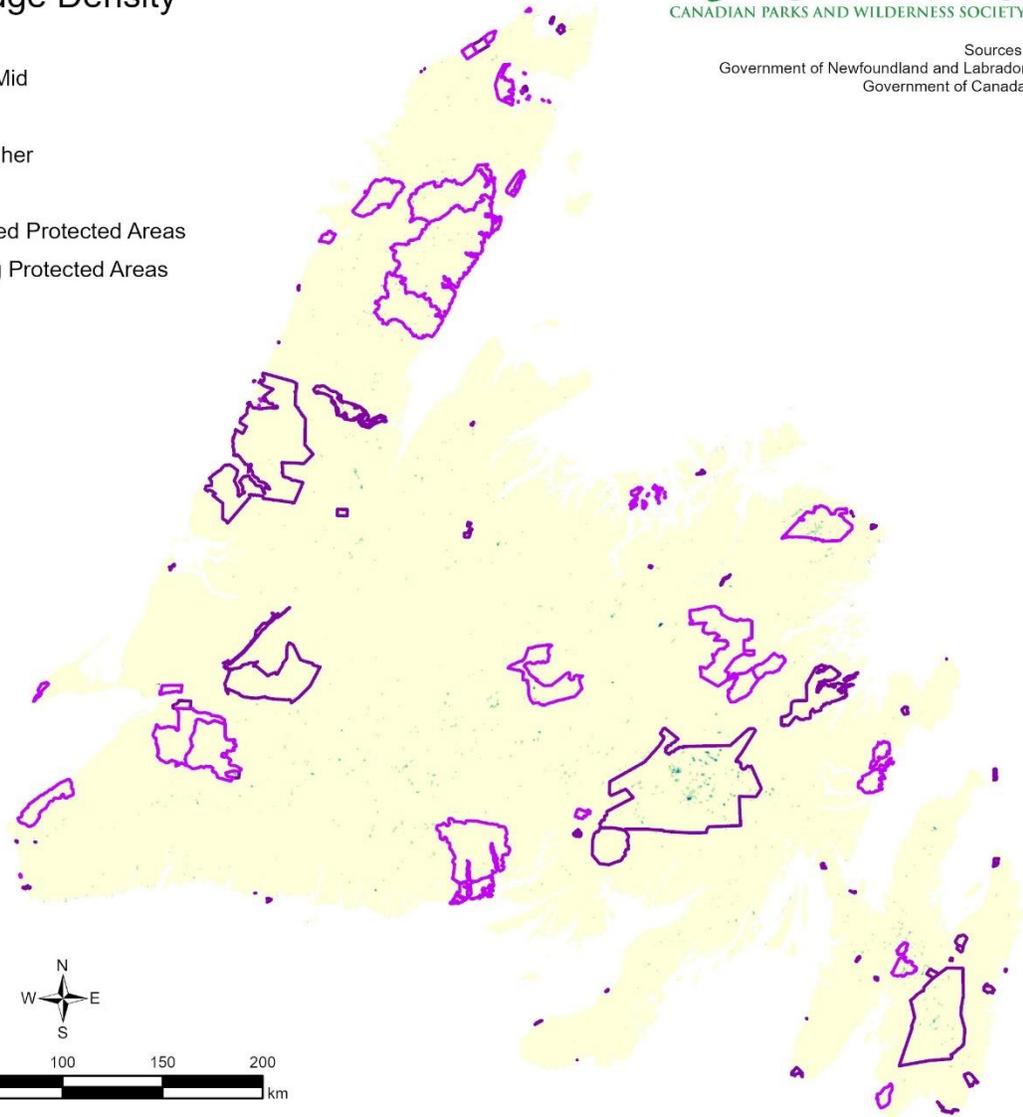


Island of Newfoundland Water Edge Density



Sources:
Government of Newfoundland and Labrador
Government of Canada

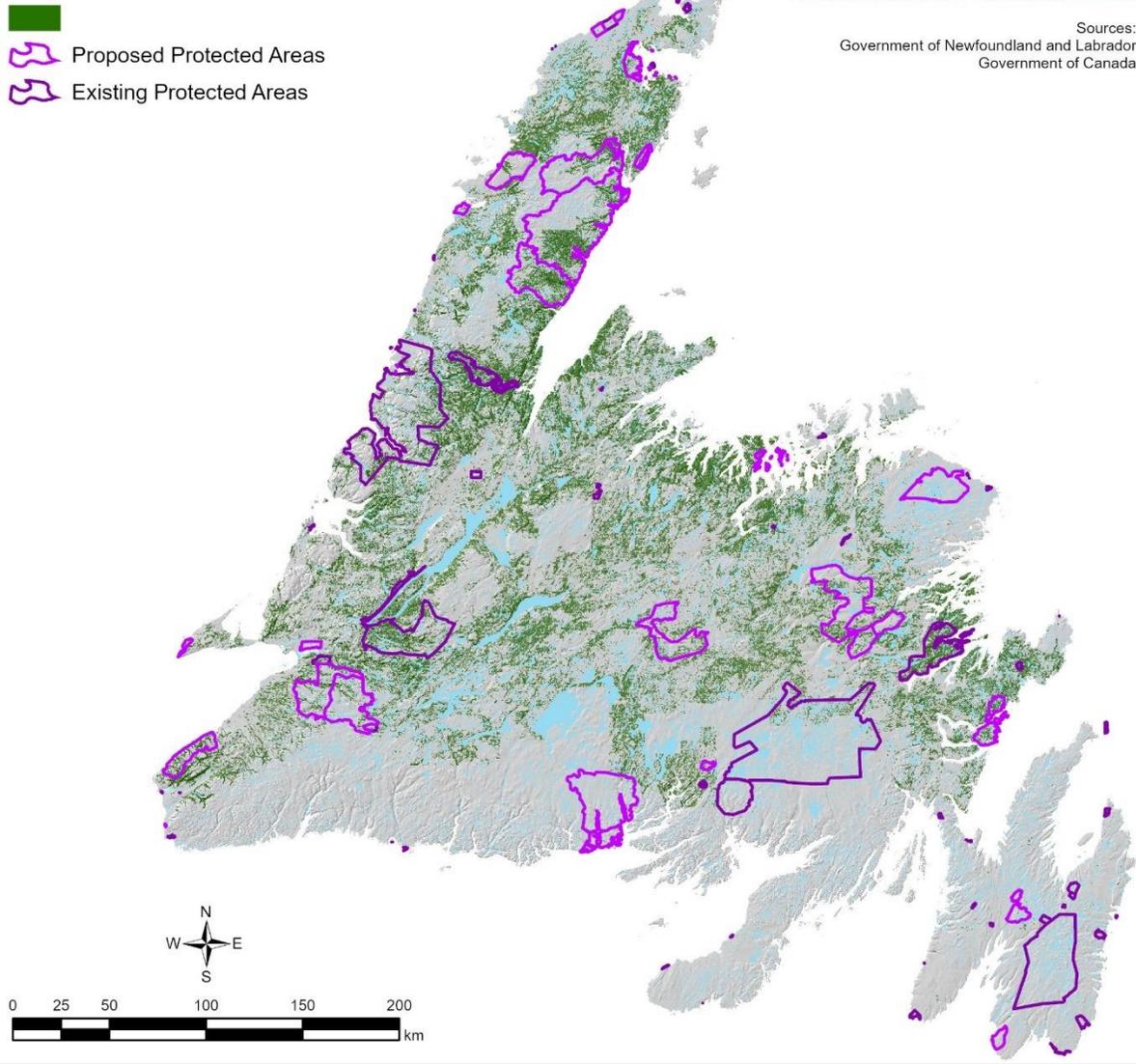
- Lower
- Lower-Mid
- Mid
- Mid-Higher
- Higher
- Proposed Protected Areas
- Existing Protected Areas



Island of Newfoundland Older Forests



Sources:
Government of Newfoundland and Labrador
Government of Canada

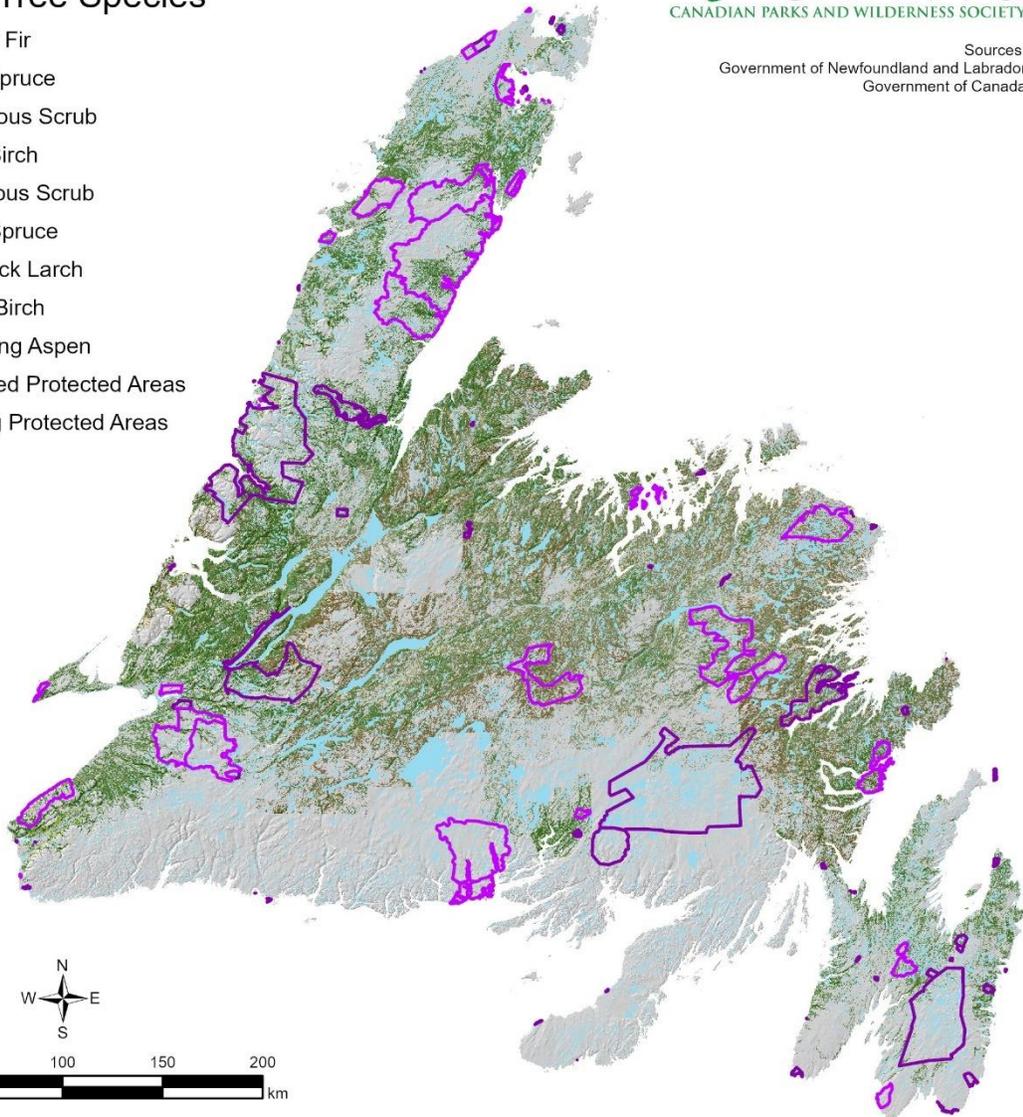


Island of Newfoundland Leading Tree Species



Sources:
Government of Newfoundland and Labrador
Government of Canada

- Balsam Fir
- Black Spruce
- Coniferous Scrub
- White Birch
- Deciduous Scrub
- White Spruce
- Tamarack Larch
- Yellow Birch
- Trembling Aspen
- Proposed Protected Areas
- Existing Protected Areas

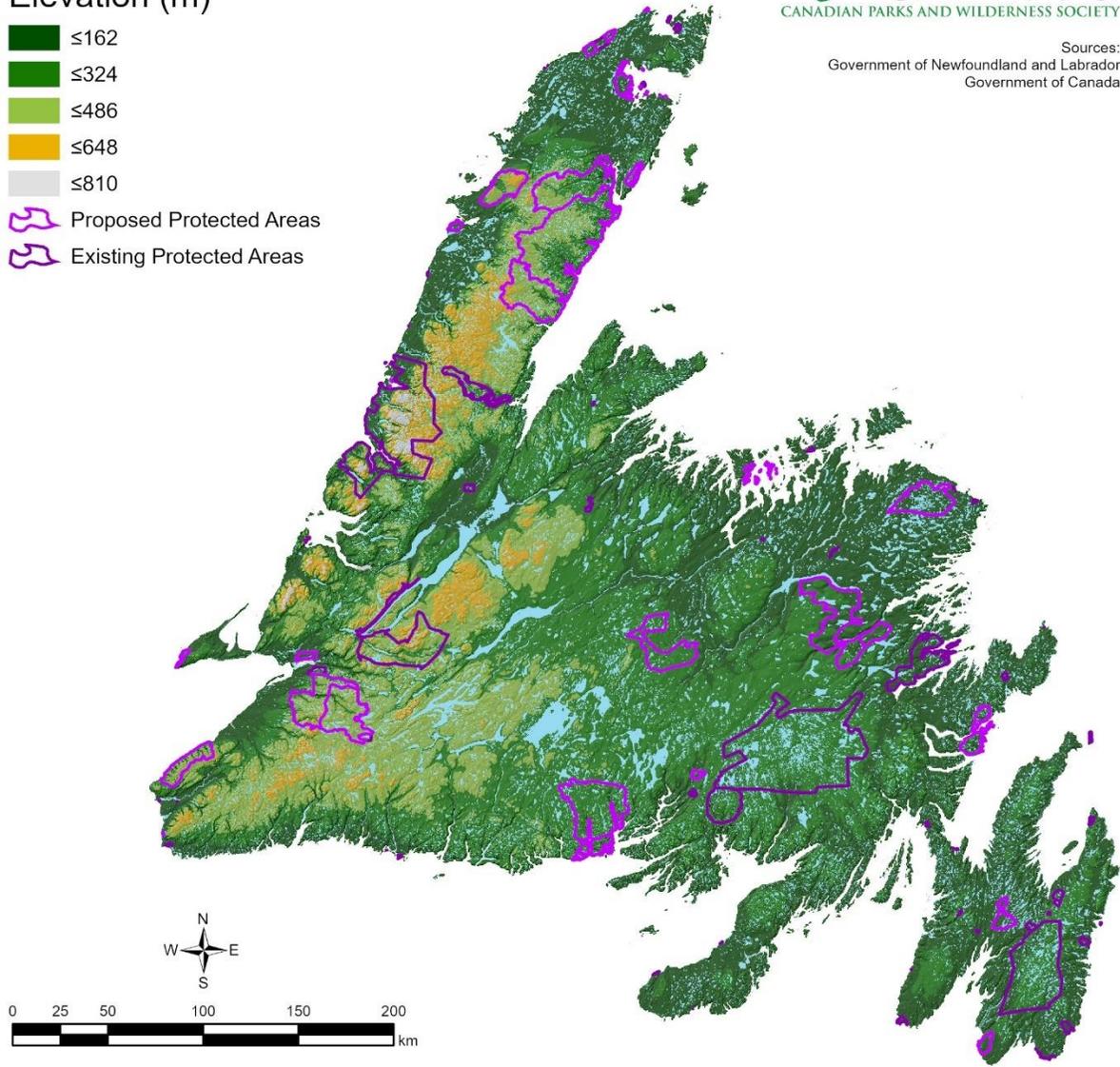


Island of Newfoundland Elevation (m)

-  ≤162
-  ≤324
-  ≤486
-  ≤648
-  ≤810
-  Proposed Protected Areas
-  Existing Protected Areas



Sources:
Government of Newfoundland and Labrador
Government of Canada

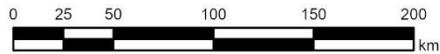
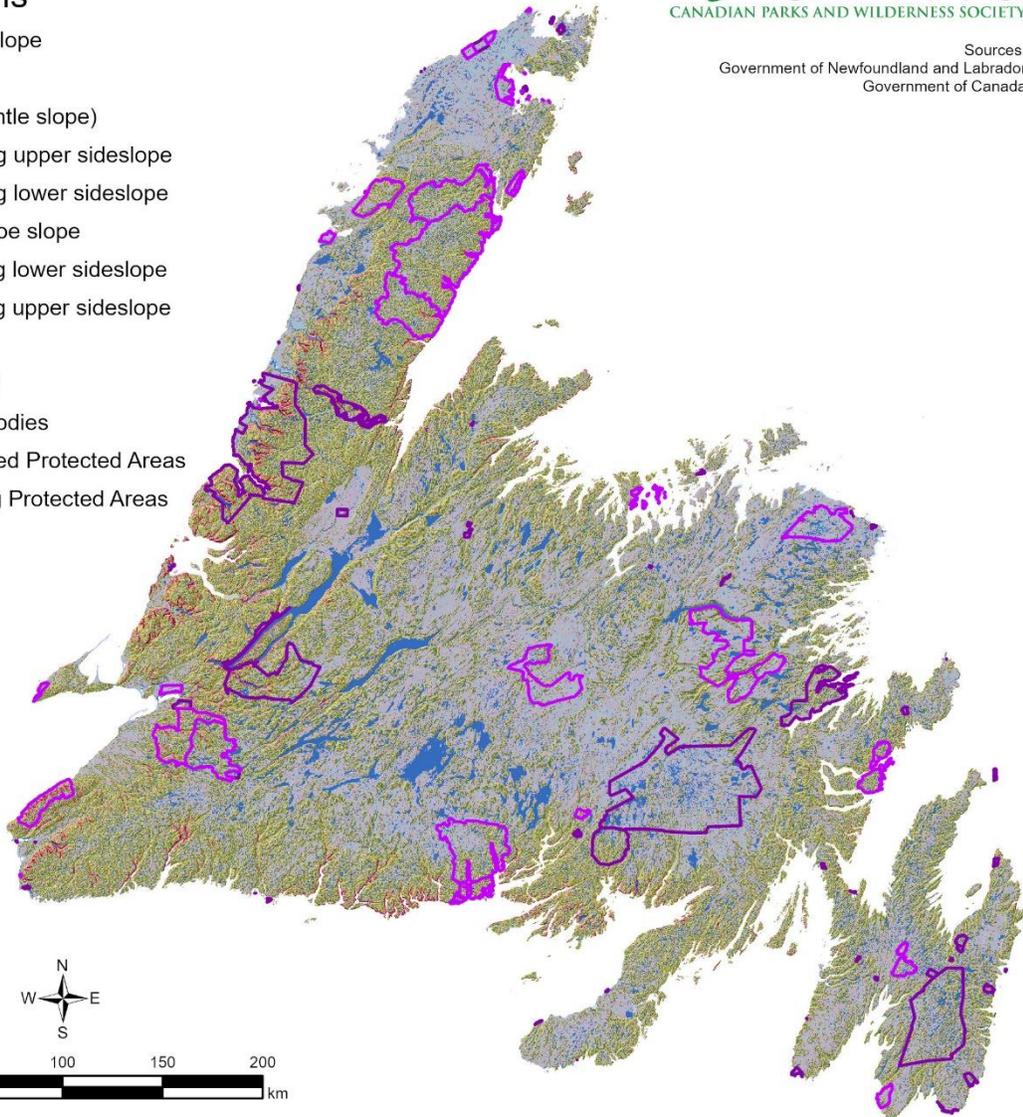


Island of Newfoundland Landforms



Sources:
Government of Newfoundland and Labrador
Government of Canada

- Steep slope
- Cliff
- Hill (gentle slope)
- N-facing upper sideslope
- N-facing lower sideslope
- Valley/toe slope
- S-facing lower sideslope
- S-facing upper sideslope
- Dry flat
- Wet flat
- Waterbodies
- Proposed Protected Areas
- Existing Protected Areas

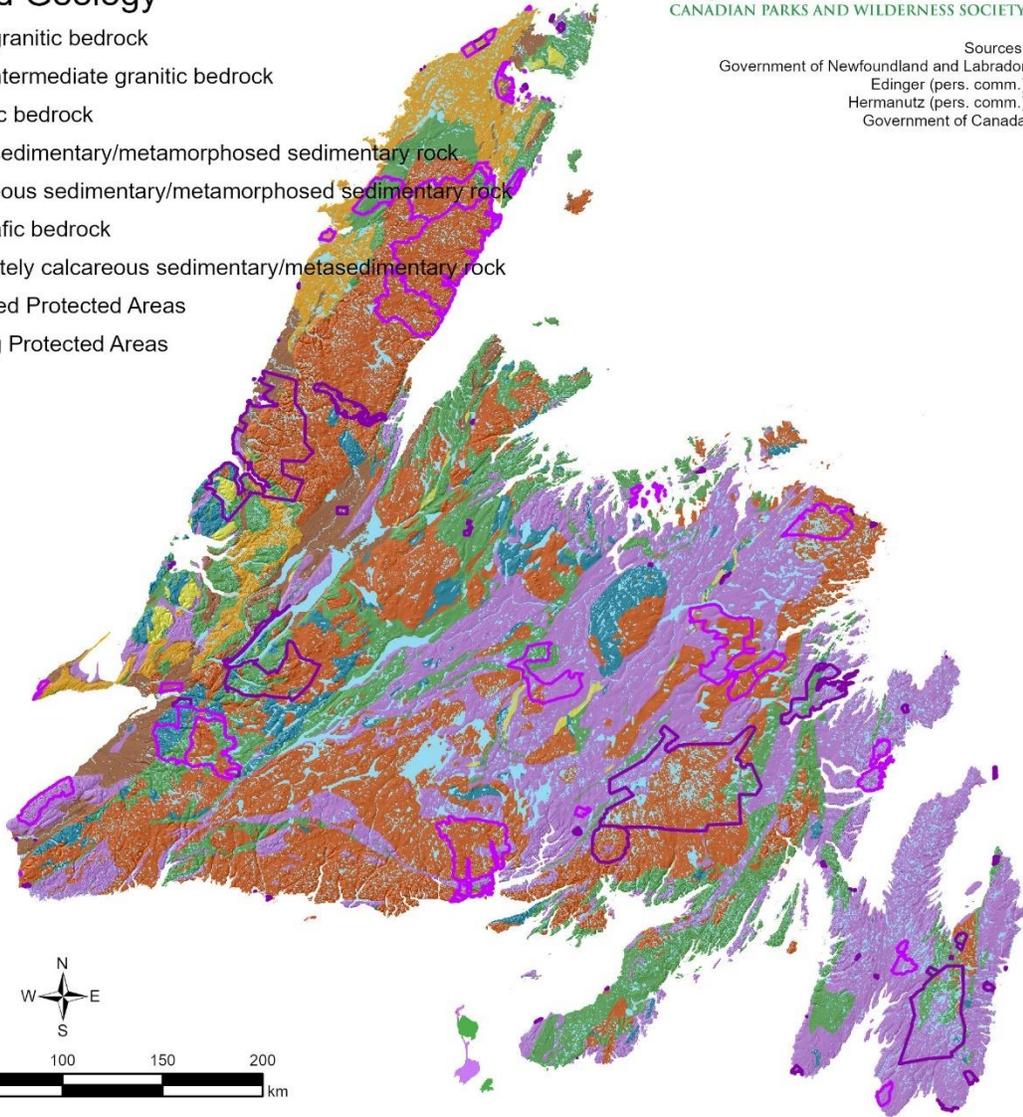


Island of Newfoundland Simplified Geology



Sources:
Government of Newfoundland and Labrador
Edinger (pers. comm.)
Hermanutz (pers. comm.)
Government of Canada

- Acidic granitic bedrock
- Mafic/Intermediate granitic bedrock
- Volcanic bedrock
- Acidic sedimentary/metamorphosed sedimentary rock
- Calcareous sedimentary/metamorphosed sedimentary rock
- Ultramafic bedrock
- Moderately calcareous sedimentary/metasedimentary rock
- Proposed Protected Areas
- Existing Protected Areas

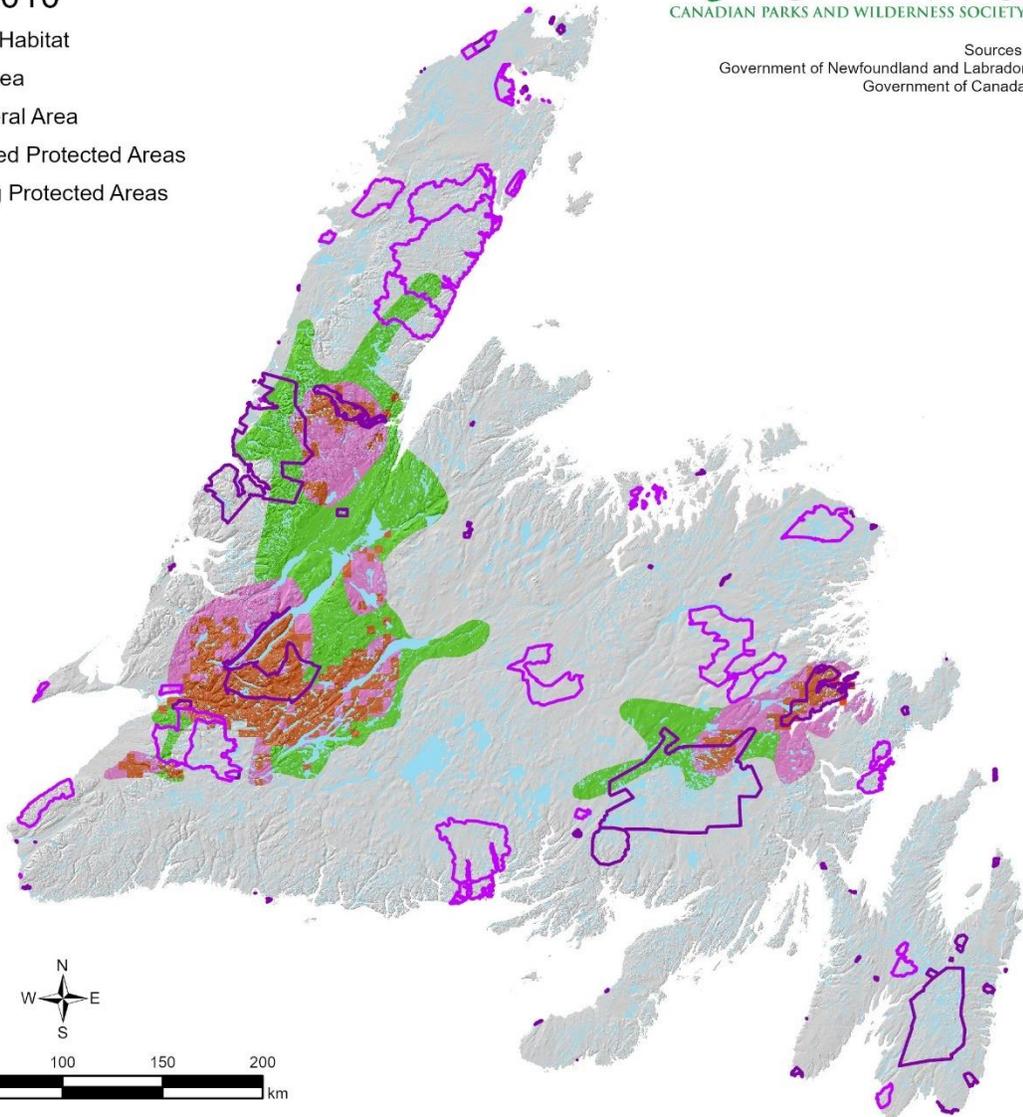


Island of Newfoundland Marten 2010



Sources:
Government of Newfoundland and Labrador
Government of Canada

- Critical Habitat
- Core Area
- Peripheral Area
- Proposed Protected Areas
- Existing Protected Areas

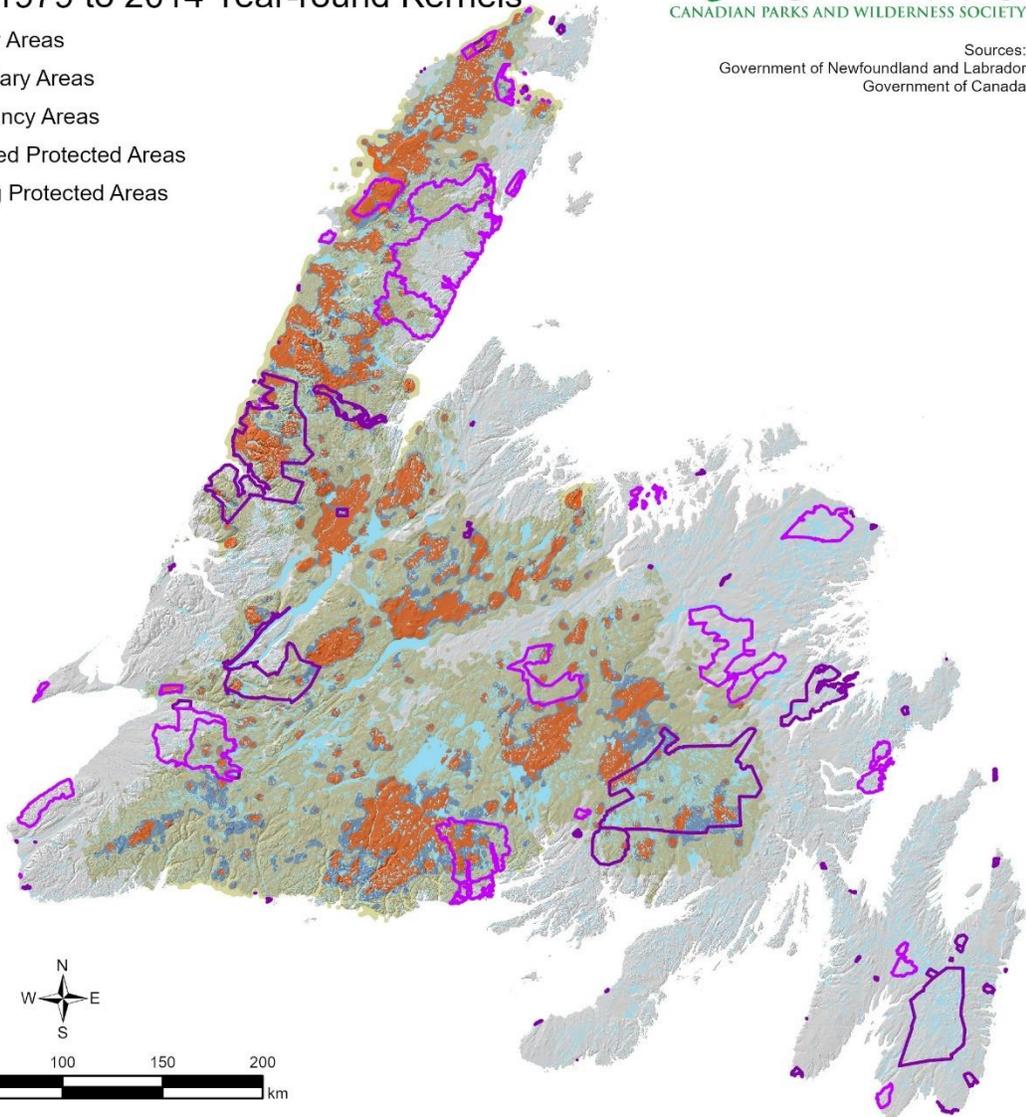


Island of Newfoundland Caribou 1979 to 2014 Year-round Kernels



Sources:
Government of Newfoundland and Labrador
Government of Canada

- Primary Areas
- Secondary Areas
- Occupancy Areas
- Proposed Protected Areas
- Existing Protected Areas

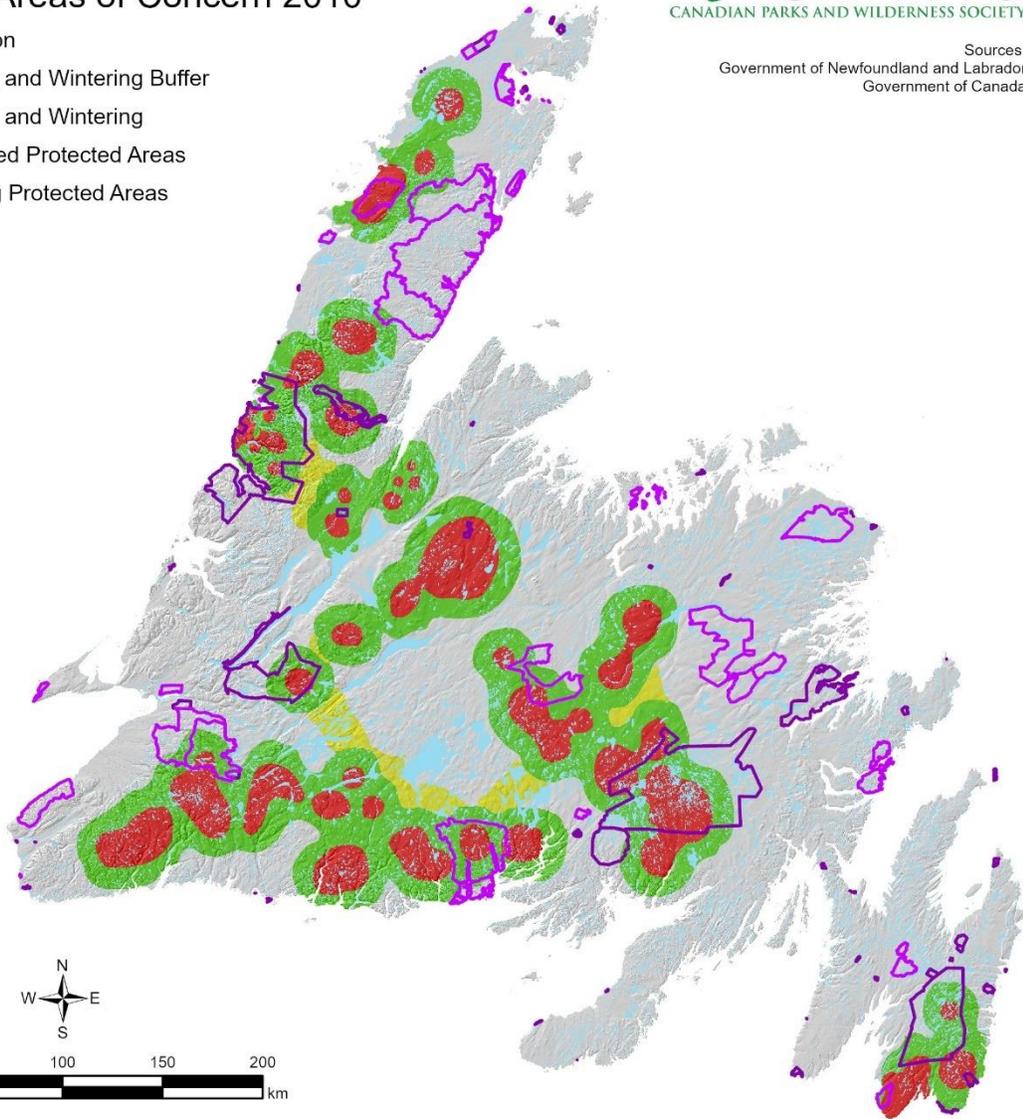


Island of Newfoundland Caribou Areas of Concern 2010



Sources:
Government of Newfoundland and Labrador
Government of Canada

- Migration
- Calving and Wintering Buffer
- Calving and Wintering
- Proposed Protected Areas
- Existing Protected Areas

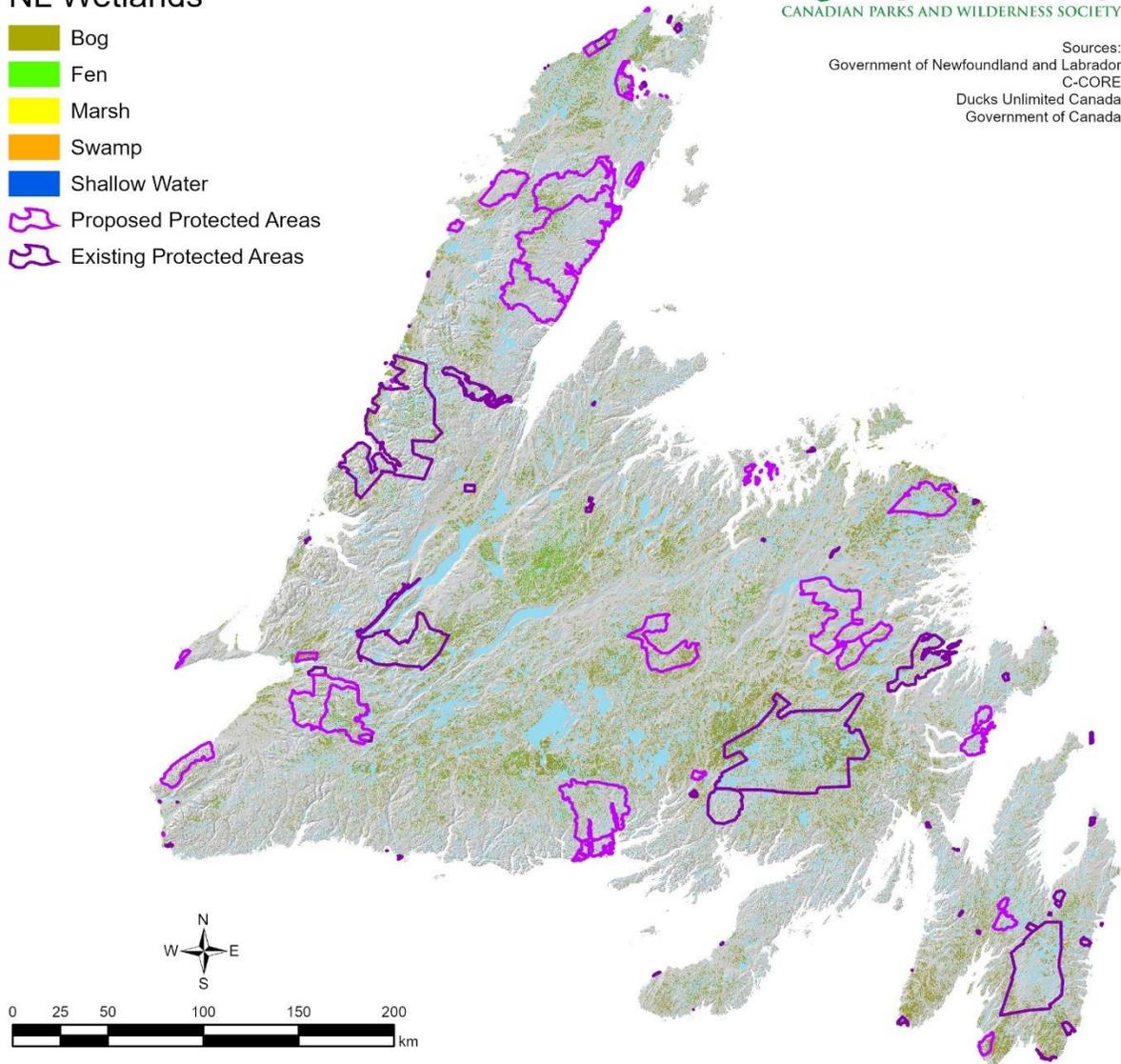


Island of Newfoundland NL Wetlands

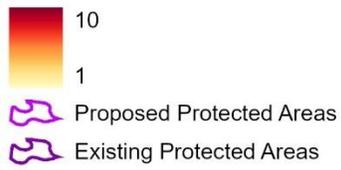
- Bog
- Fen
- Marsh
- Swamp
- Shallow Water
- Proposed Protected Areas
- Existing Protected Areas



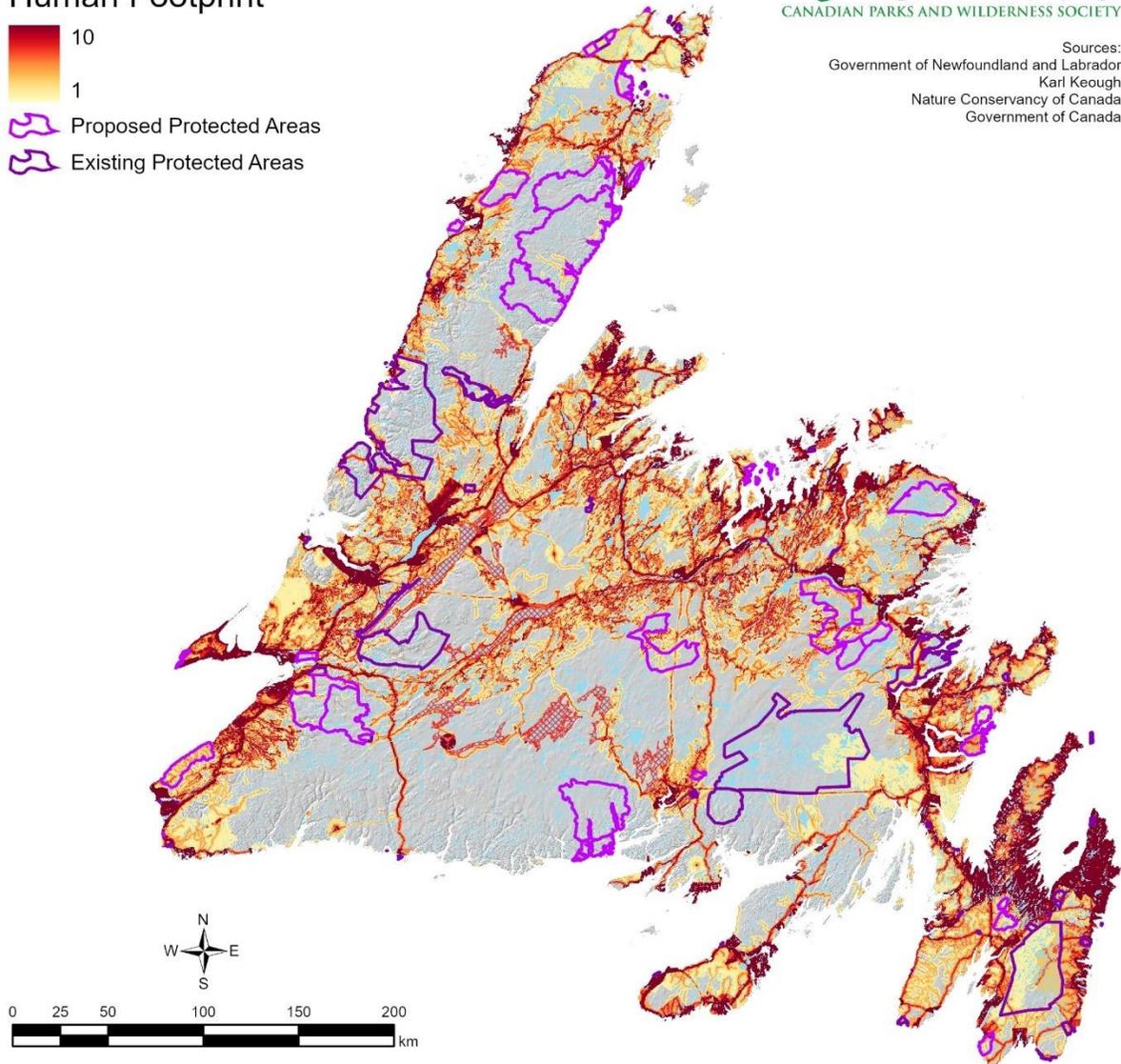
Sources:
Government of Newfoundland and Labrador
C-CORE
Ducks Unlimited Canada
Government of Canada



Island of Newfoundland Human Footprint



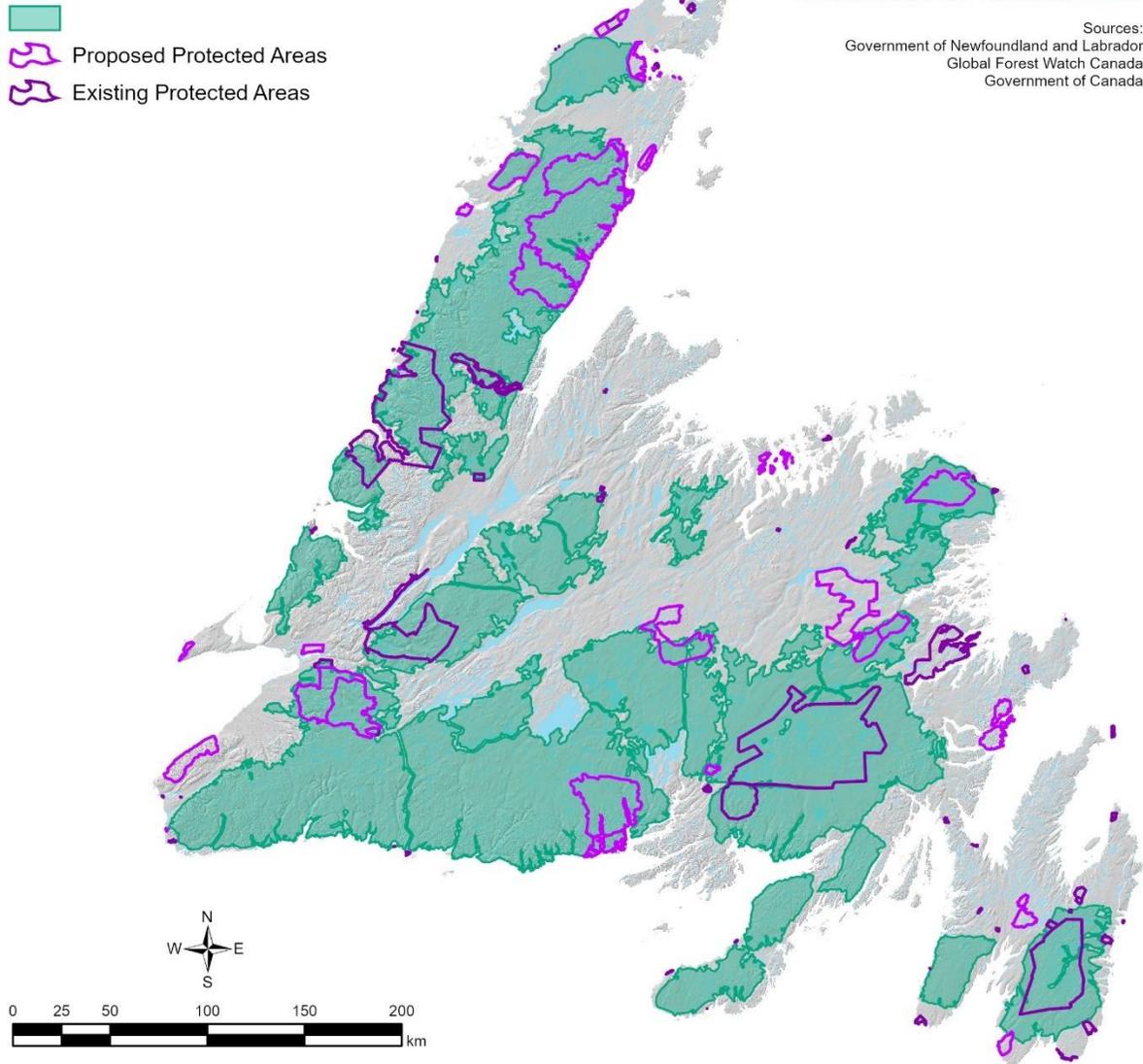
Sources:
Government of Newfoundland and Labrador
Karl Keough
Nature Conservancy of Canada
Government of Canada



Island of Newfoundland Intact Forest Landscapes > 50,000 ha



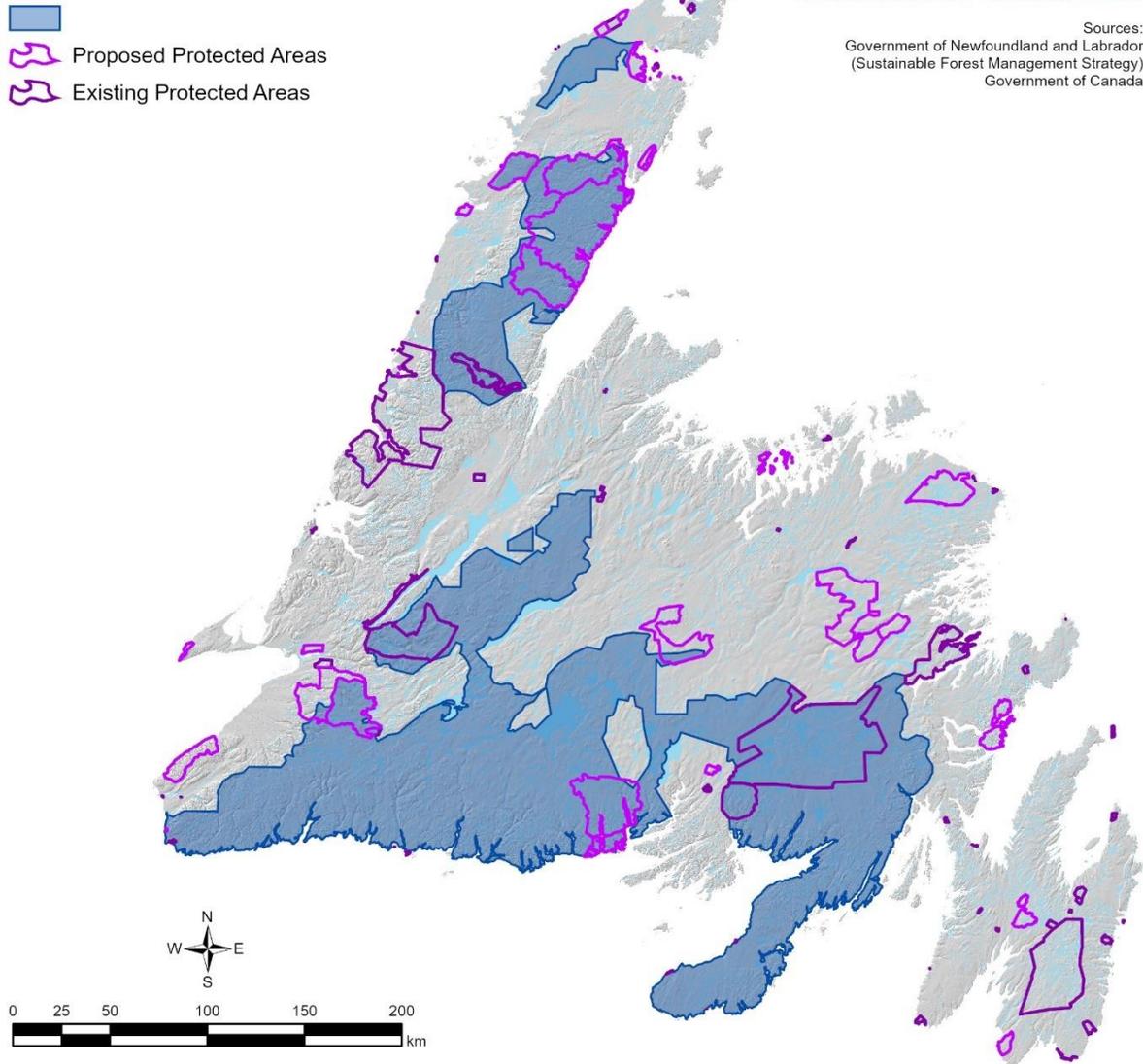
Sources:
Government of Newfoundland and Labrador
Global Forest Watch Canada
Government of Canada



Island of Newfoundland Large Intact Landscape Area



Sources:
Government of Newfoundland and Labrador
(Sustainable Forest Management Strategy)
Government of Canada

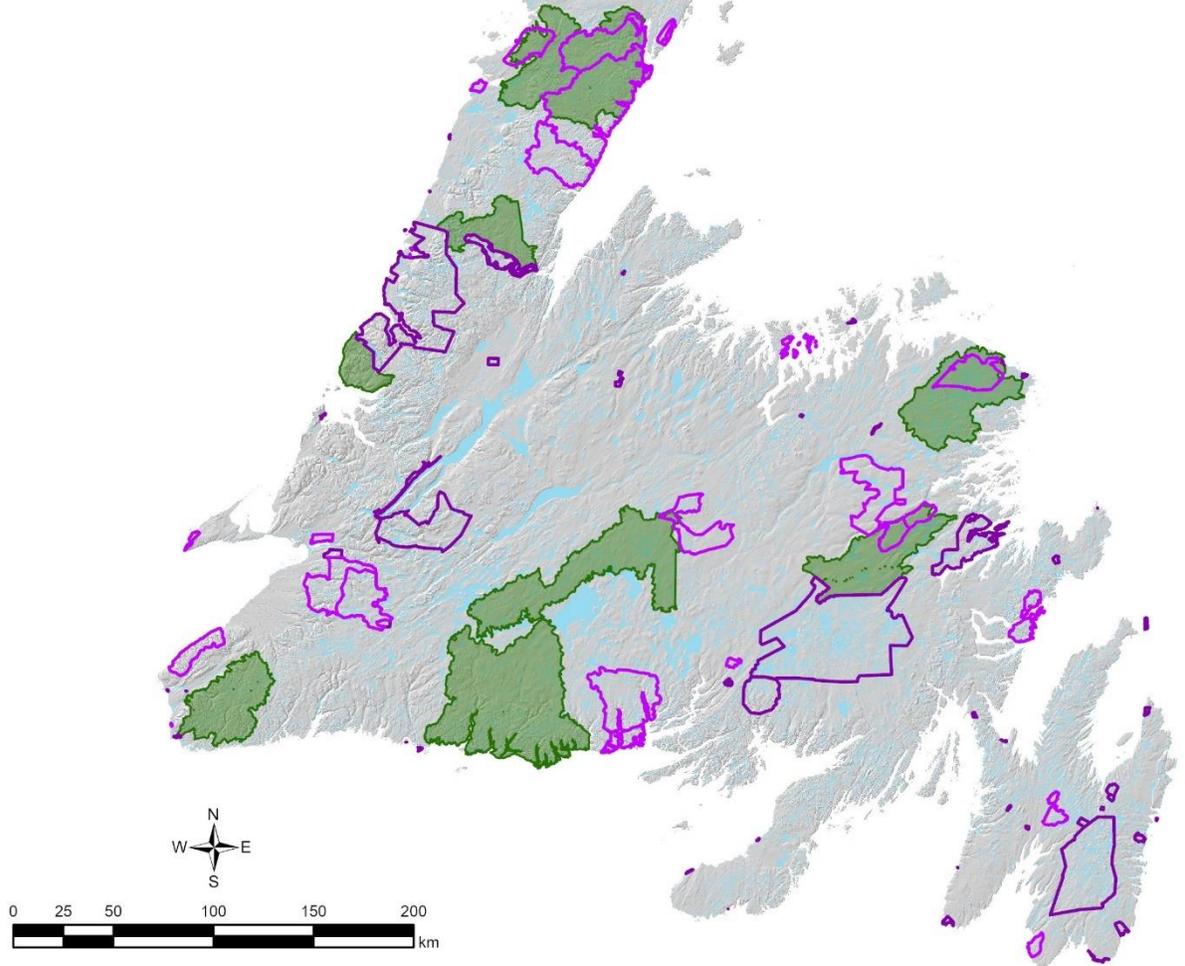


Island of Newfoundland Benchmark Areas of Interest

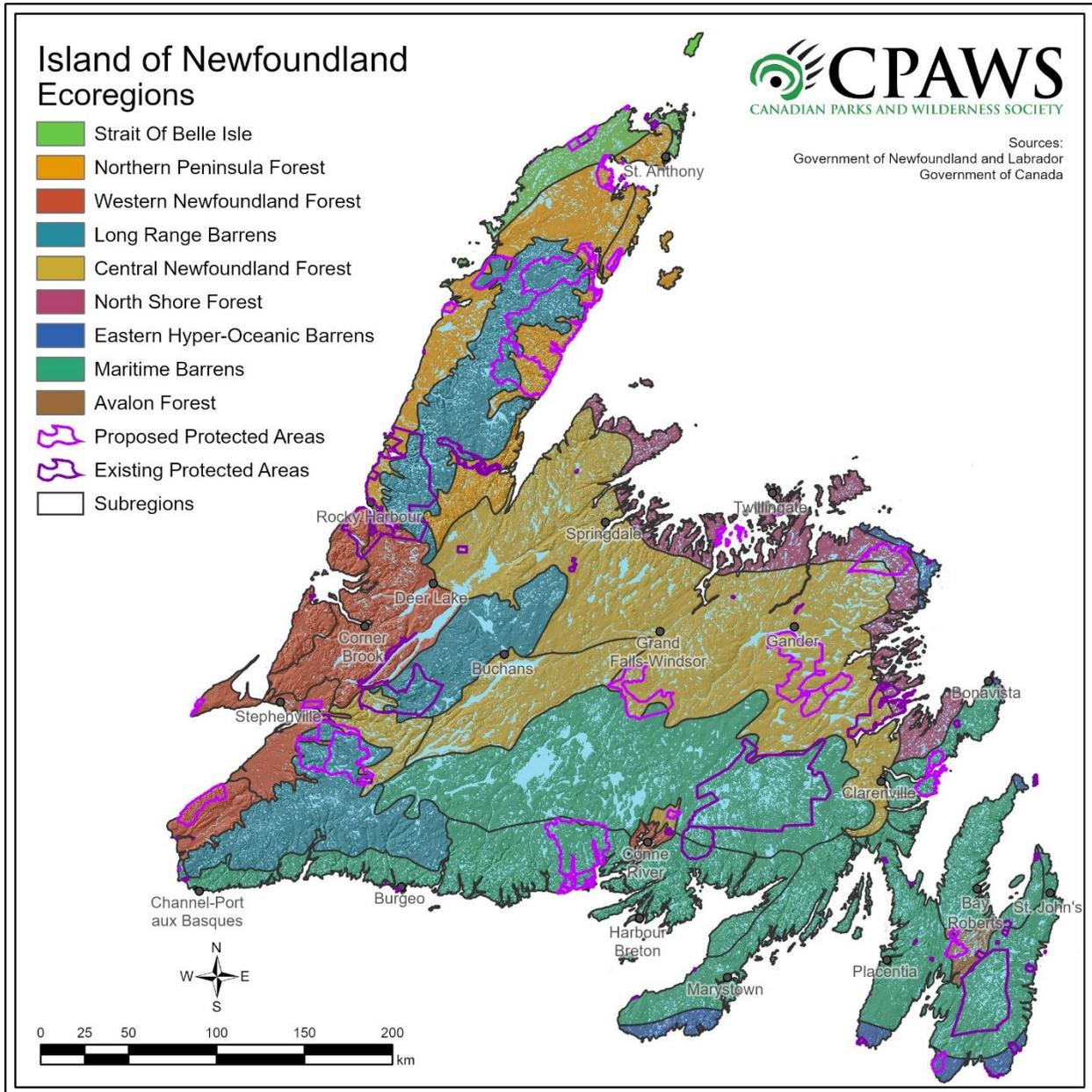


Sources:
Government of Newfoundland and Labrador
Canadian Boreal Forest Agreement
Corner Brook Pulp and Paper Ltd.
Canadian Parks and Wilderness Society
Government of Canada

-  Proposed Protected Areas
-  Existing Protected Areas



Appendix B - Ecoregion/Subregion Maps

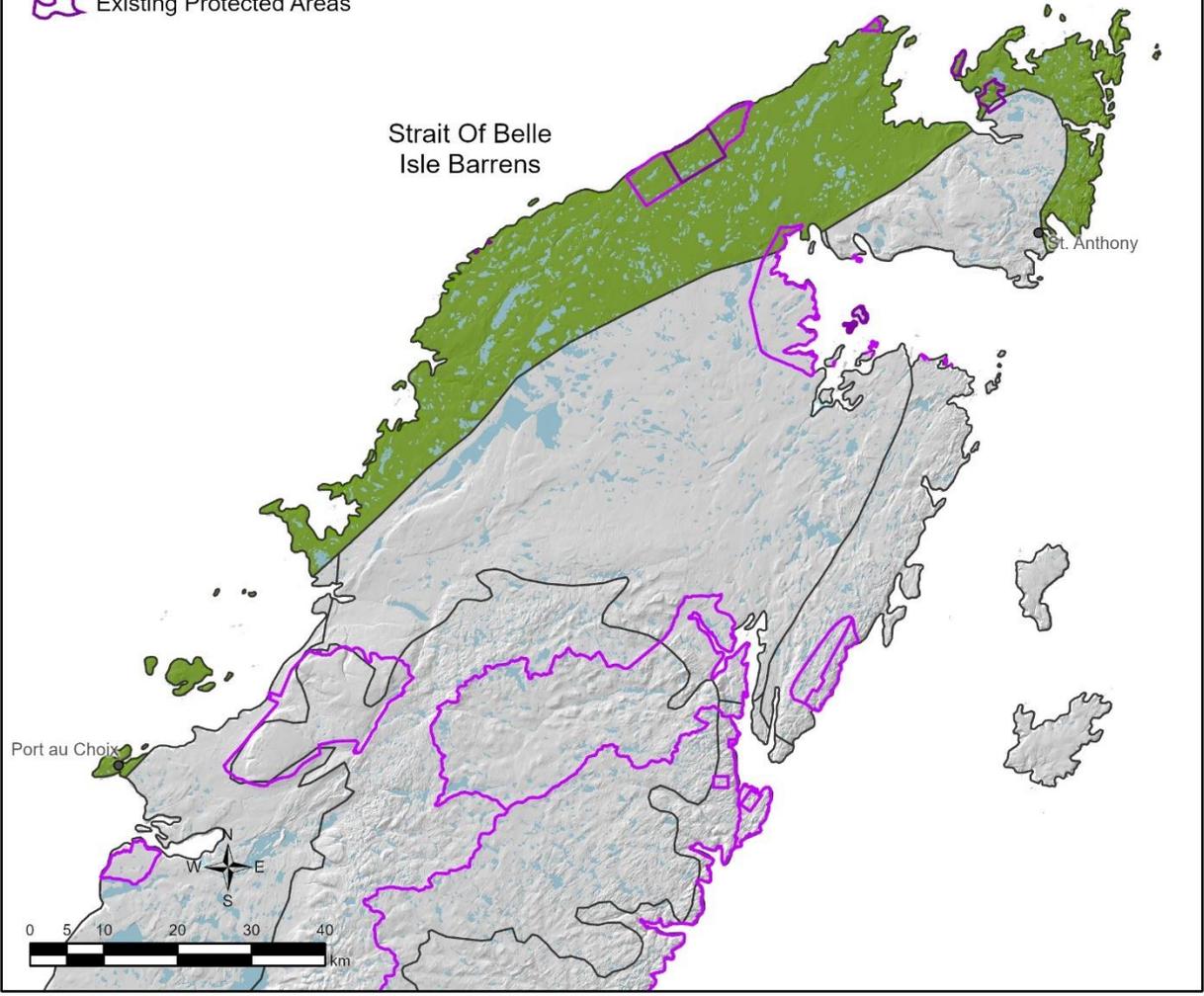


Strait of Belle Isle Ecoregion



Sources:
Government of Newfoundland and Labrador
Government of Canada

- Subregions
- Subregions
- Proposed Protected Areas
- Existing Protected Areas

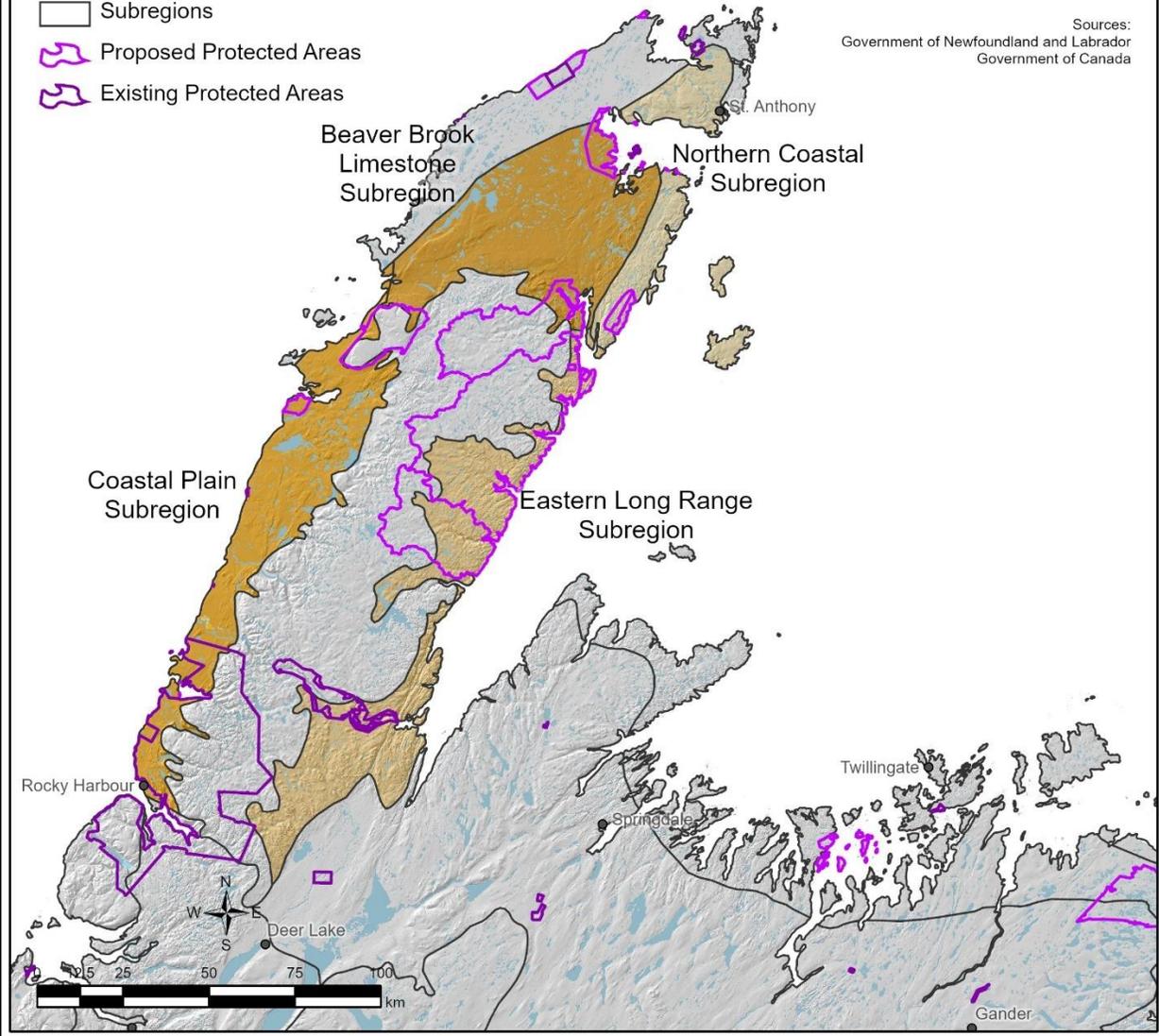


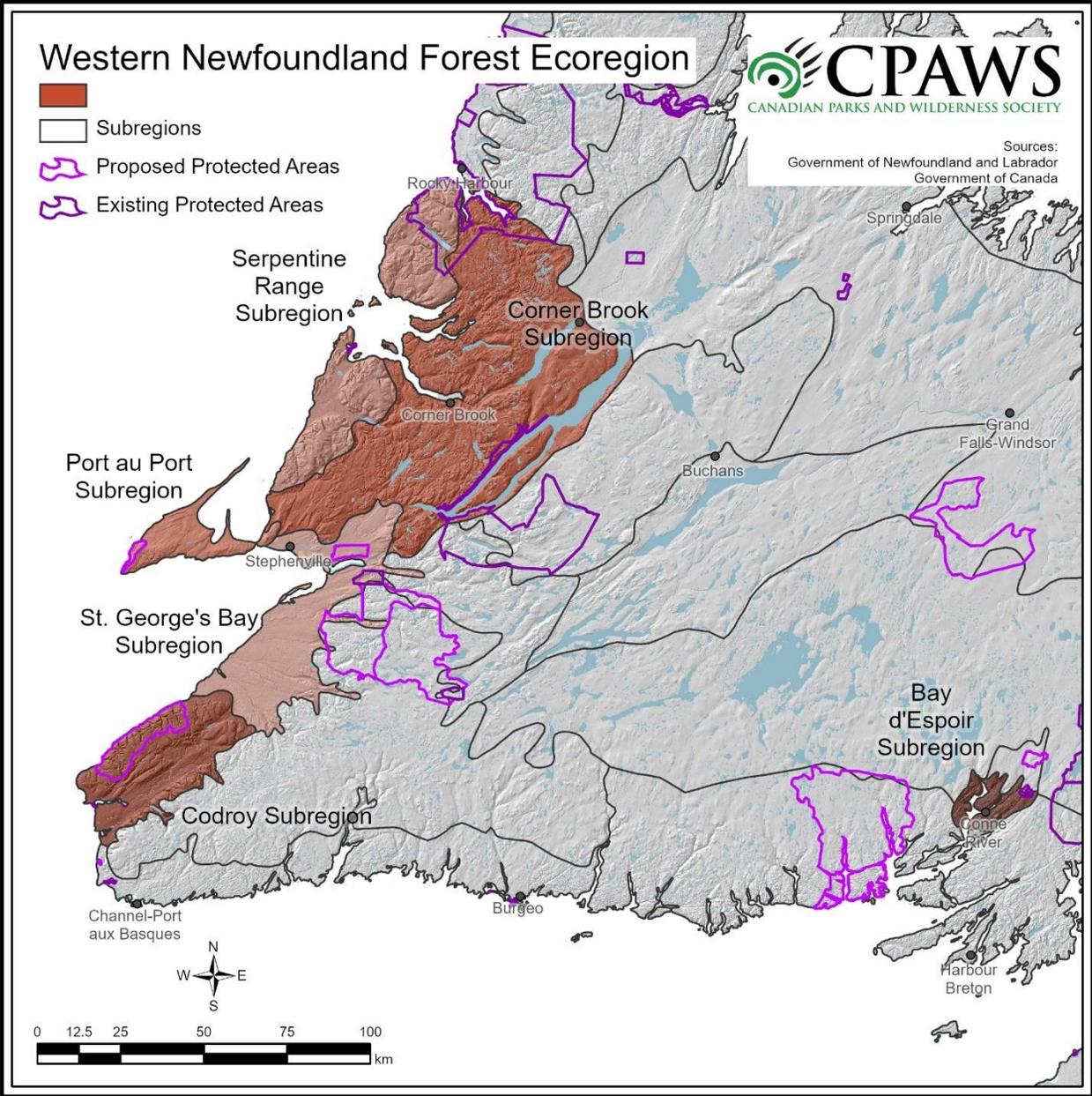
Northern Peninsula Forest Ecoregion

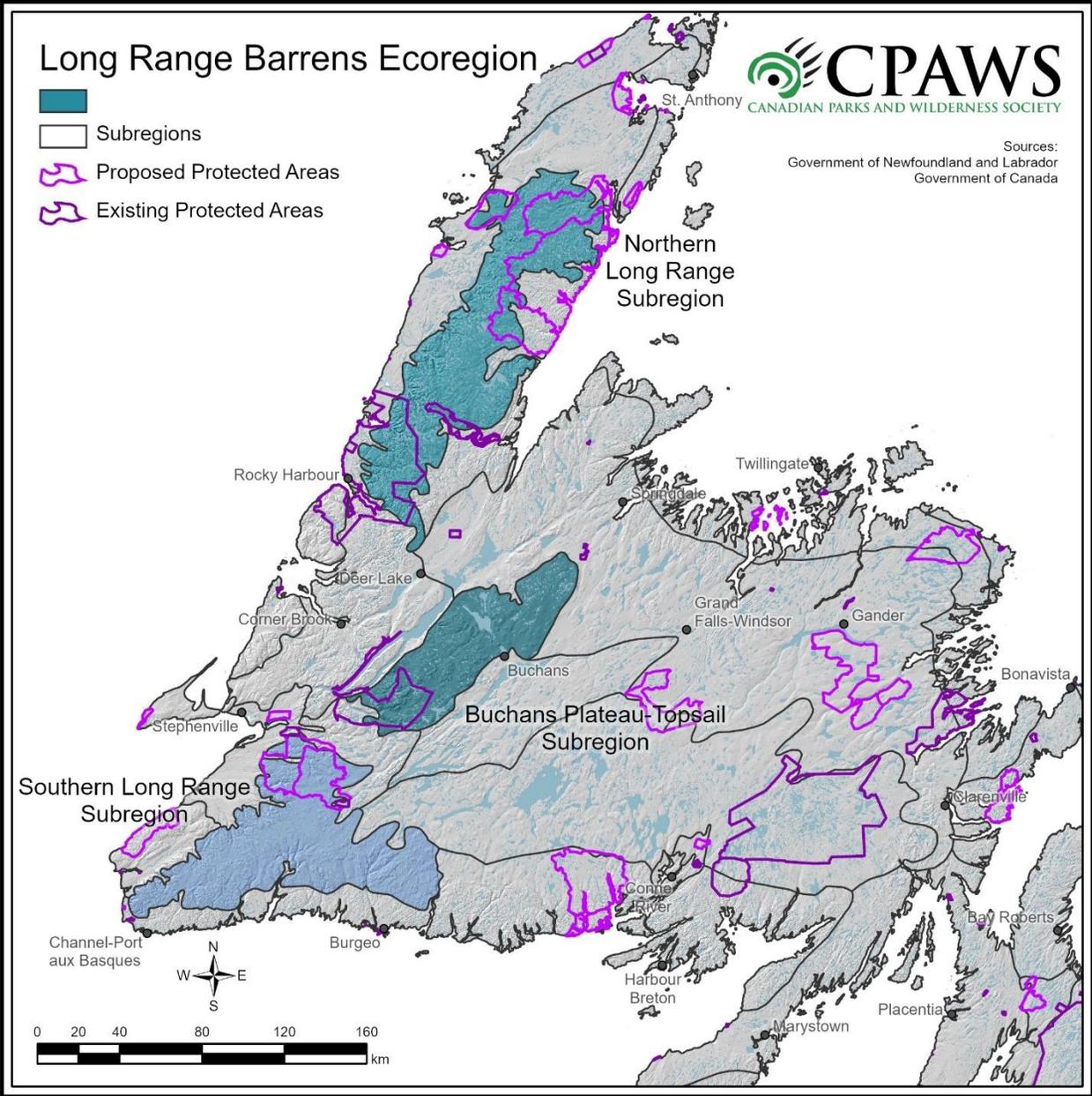


Sources:
Government of Newfoundland and Labrador
Government of Canada

- Subregions
- Subregions
- Proposed Protected Areas
- Existing Protected Areas





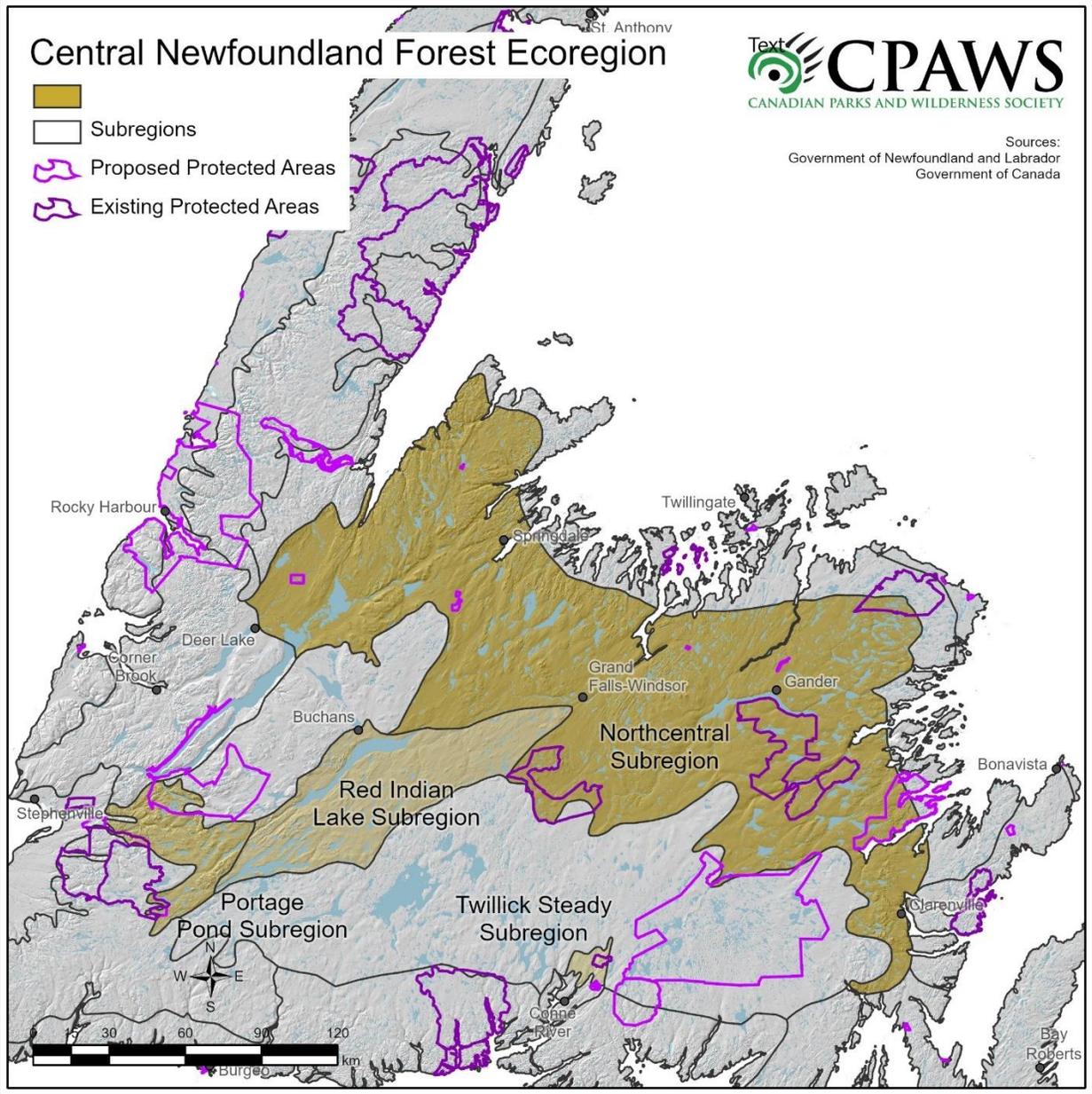


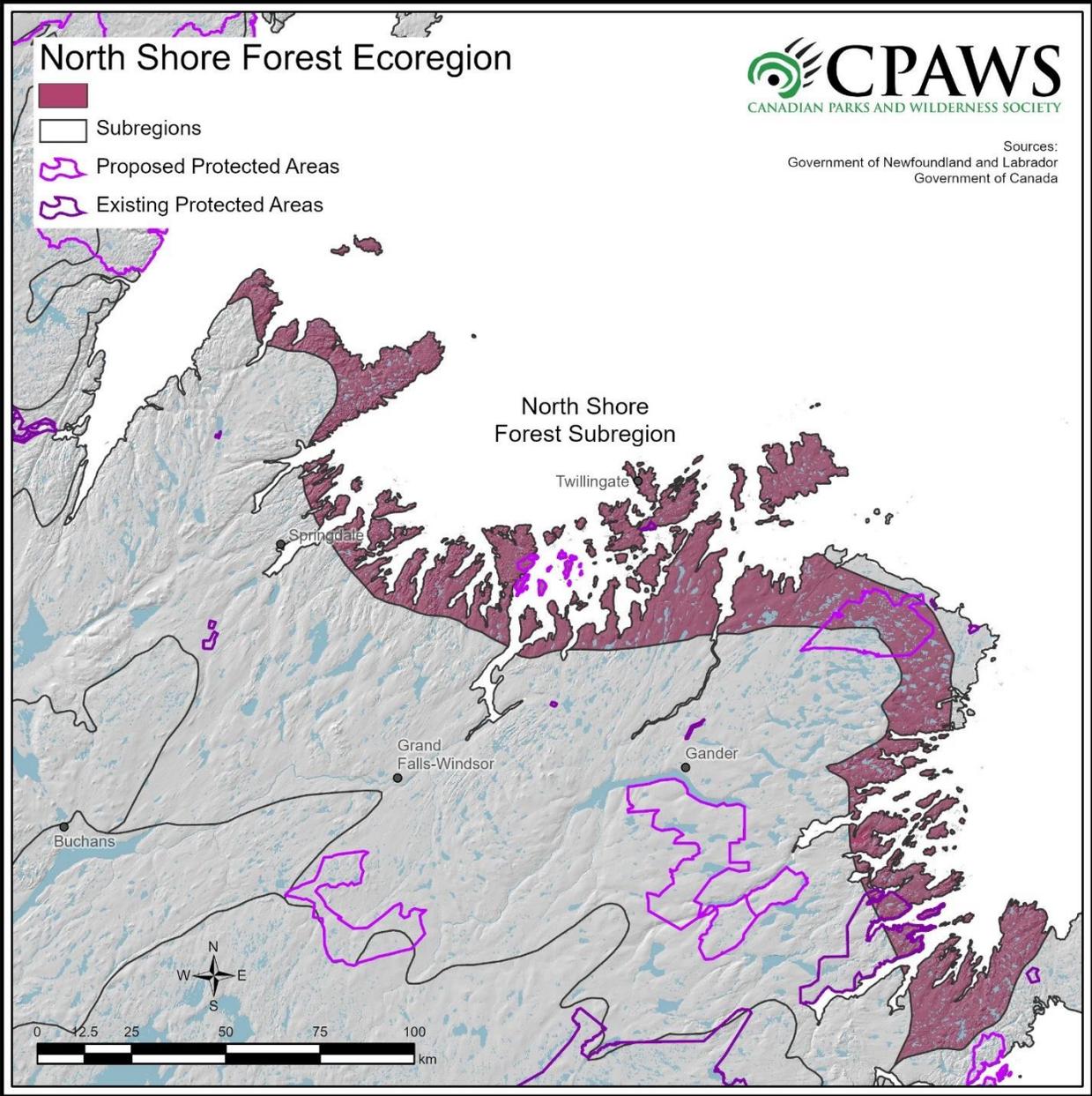
Central Newfoundland Forest Ecoregion

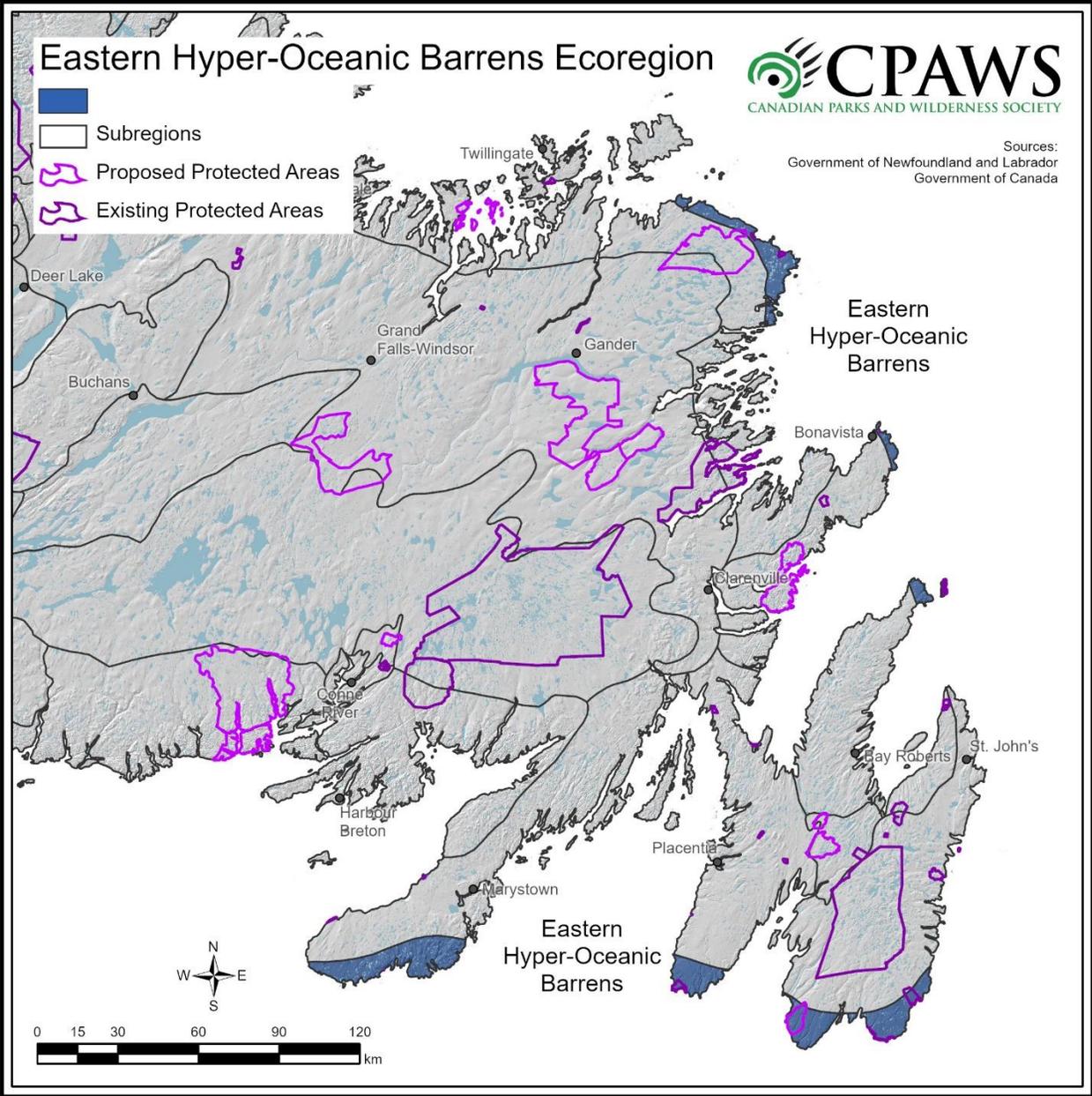


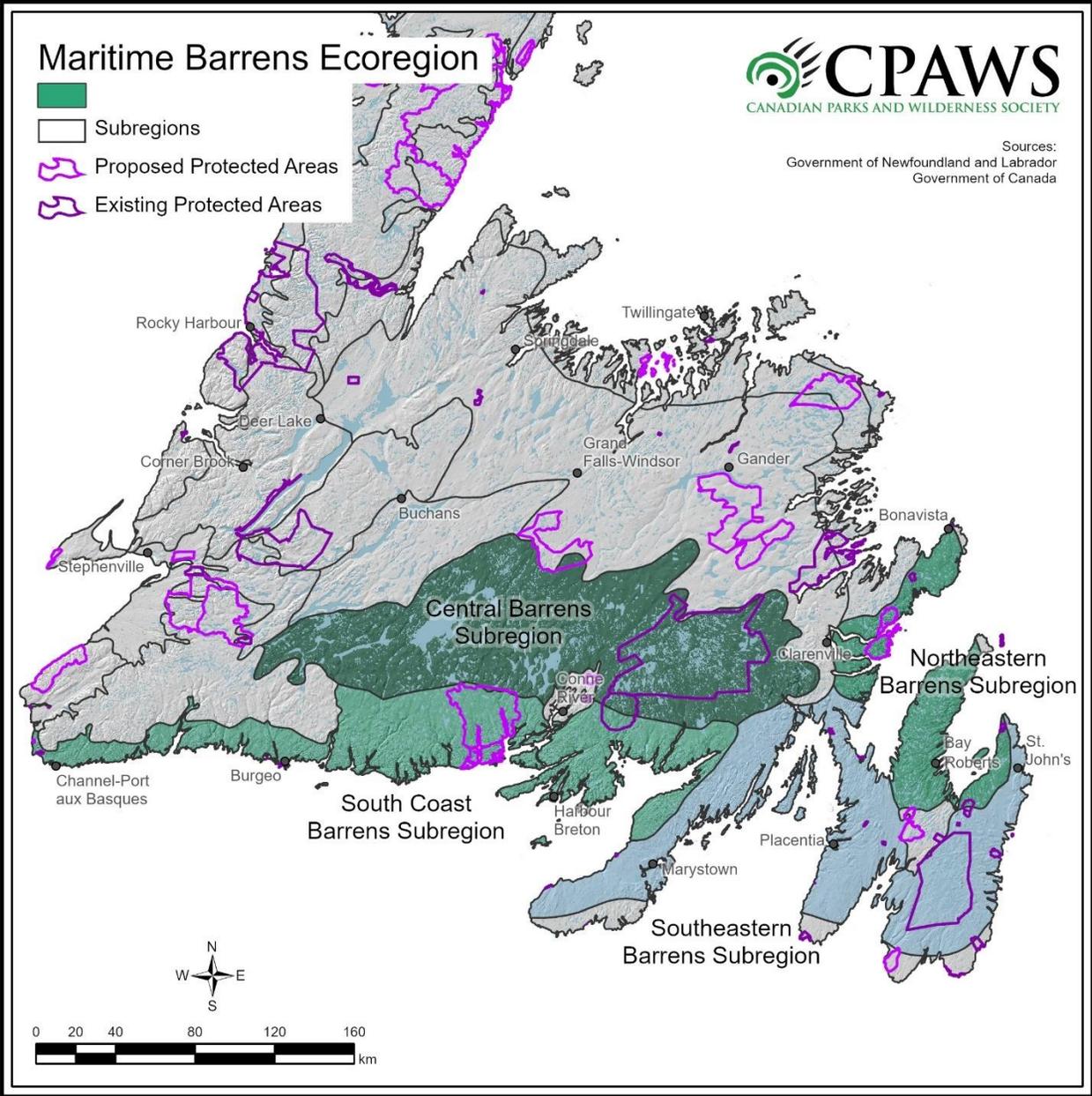
Sources:
Government of Newfoundland and Labrador
Government of Canada

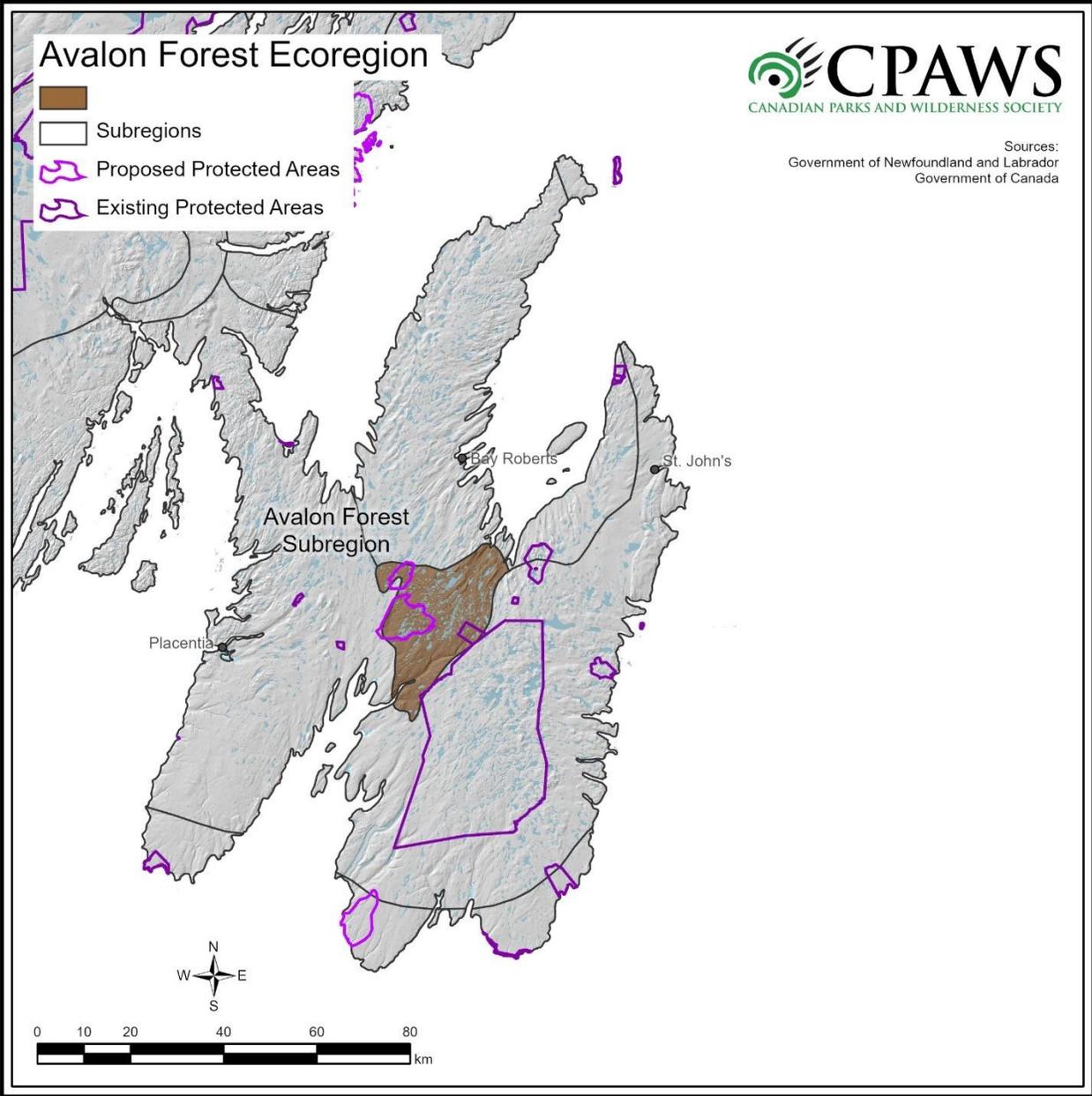
- Subregions
- Proposed Protected Areas
- Existing Protected Areas











Appendix C - Ecoregion Representation Improvements

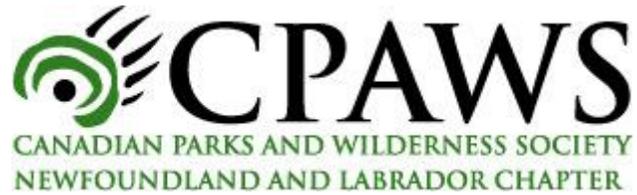
| Ecoregion | Feature | Class | Coverage Increase |
|---------------------------|------------------------|--------------------------|-------------------|
| Belle Isle Strait | Older Forests | | 559% |
| Northern Peninsula Forest | Combined Land Cover | Rock/Barren/Non-Forest | 1463% |
| | | Shrub/Herb | 963% |
| | | Mixedwood | 353% |
| | Climate Moisture Index | Lower | 211% |
| | | Lower-Mid | 302% |
| | Projected CMI | Lower-Mid | 498/502% |
| | Productivity | Lower-Mid | 654% |
| | Water Edge Density | Lower | 285% |
| | | Lower-Mid | 1258% |
| | Older Forests | | 2460% |
| | Elevation | Lower-Mid | 636% |
| | | Mid | 858% |
| | Landforms | Hill (gentle slope) | 429% |
| | | N-facing upper sideslope | 371% |
| | | S-facing upper sideslope | 391% |
| | | Dry flat | 221% |
| | | Valley/toe slope | 370% |
| | | N-facing lower sideslope | 333% |
| | | S-facing lower sideslope | 374% |
| | Simplified Geology | Acidic granitic | 580% |
| | | Volcanic | 986% |
| | | Calcareous | 523% |
| Long Range Barrens | Combined Land Cover | Rock/Barren/Nonforest | 361% |
| | | Shrub/Herb | 301% |
| | Climate Moisture Index | Lower-Mid | 463% |
| | | Mid-Higher | 1049% |
| | Projected CMI | Mid-Higher | 914/916% |
| | | Higher | 4348/4348% |
| | Productivity | Lower | 207% |
| | Water Edge Density | Lower-Mid | 313% |
| | Elevation | Lower-Mid | 339% |
| | | Mid | 342% |
| | Landforms | Hill (gentle slope) | 228% |
| | | Dry flat | 345% |
| | | Wet flat | 317% |
| Valley/toe slope | | 214% | |
| Simplified Geology | Mafic | 779% | |
| | Volcanic | 394% | |
| | Calcareous | 758% | |
| North Shore Forest | Combined Land Cover | Water | 219% |
| | | Wetland | 881% |
| | | Rock/Barren/Nonforest | 4095% |
| | | Broadleaf | 844% |
| | | Mixedwood | 3200% |
| | Climate Moisture Index | Lower | 515% |
| | Projected CMI | Lower | 219/1937% |
| Productivity | Lower-Mid | 373% | |

| | | | |
|-------------------------------|------------------------|-----------------------|------------|
| | | Mid | 677% |
| | Water Edge Density | Lower | 229% |
| | | Lower-Mid | 11225% |
| | Older Forests | | 273% |
| | Leading Tree Species | Coniferous Scrub | 284% |
| | | Deciduous Scrub | 293% |
| | Elevation | Lower | 239% |
| | Landforms | Dry flat | 598% |
| | | Wet flat | 1154% |
| | | Waterbodies | 487% |
| | Simplified Geology | Acidic granitic | 2210% |
| Central Newfoundland Forest | Combined Land Cover | Wetland | 342% |
| | | Rock/Barren/Nonforest | 517% |
| | | Shrub/Herb | 300% |
| | | Coniferous | 219% |
| | | Broadleaf | 425% |
| | | Mixedwood | 224% |
| | Projected CMI | Lower | 236/350% |
| | | Lower /Mid | 400/331% |
| | | Mid-Higher | 2421/3699% |
| | Productivity | Mid | 354% |
| | | Higher | 2862% |
| | Water Edge Density | Lower | 253% |
| | | Mid-Lower | 1724% |
| | | Mid | 219% |
| | Older Forests | | 615% |
| | Leading Tree Species | Coniferous Scrub | 224% |
| | Elevation | Lower | 212% |
| | | Lower-Mid | 890% |
| | Landforms | Hill (gentle slope) | 214% |
| | | Dry flat | 432% |
| | | Wet flat | 638% |
| | | Waterbodies | 208% |
| | Simplified Geology | Acidic granitic | 88940% |
| | | Volcanic | 462% |
| Eastern Hyper-Oceanic Barrens | Combined Land Cover | Rock/Barren/Nonforest | 256% |
| | Productivity | Mid | 355% |
| | Landforms | Waterbodies | 612% |
| Western Newfoundland Forest | Combined Land Cover | Shrub/Herb | 468% |
| | Climate Moisture Index | Mid-Higher | 1301% |
| | Projected CMI | Higher | 2178%/INF |
| | Older Forest | | 205% |
| | Leading Tree Species | Yellow Birch | 697% |
| | Simplified Geology | Acidic sedimentary | 1394% |
| Maritime Barrens | Projected CMI | Lower-Mid | 221/922% |
| | | Higher | 675%/INF |
| | Elevation | Mid | 14530% |
| | Landforms | Steep slope | 1897% |
| | | Cliff | 9300% |
| Avalon Forest | Combined Land Cover | Water | 620% |
| | | Wetland | 446% |
| | | Rock/Barren/Nonforest | 539% |
| | | Shrub/Herb | 621% |

| | | | |
|--|------------------------|--------------------------|----------|
| | | Coniferous | 593% |
| | | Mixedwood | 276% |
| | Climate Moisture Index | Mid-Higher | 566% |
| | Projected CMI | Mid | 775%/INF |
| | | Mid-Higher | 565% |
| | Productivity | Lower-Mid | 398% |
| | | Mid | 669% |
| | | Mid-Higher | 506% |
| | Water Edge Density | Lower | 500% |
| | Elevation | Lower | 568% |
| | | Lower-Mid | 222% |
| | Landforms | Hill (gentle slope) | 724% |
| | | Dry flat | 741% |
| | | Wet flat | 350% |
| | | Valley/toe slope | 579% |
| | | S-facing lower sideslope | 343% |
| | | Waterbodies | 713% |
| | Simplified Geology | Acidic sedimentary | 3074% |

Electronic Appendices

See <https://1drv.ms/u/s!Ajv6BHSXrqqqm4BuKROJdWb49WBcbw?e=YKiZNM> for electronic versions of the full set of tabular analysis results, as well images of the maps and the report in PDF format.



September 30, 2020

Dear WERAC Secretariat:

Please find attached CPAWS NL submission, with attached email appendices, for the “Home for Nature” Protected Areas Plan. Thank you for this opportunity to provide feedback and we look forward to advancing this important file to the next phase.

Regards,

Suzanne Dooley
Conservation Director

Tanya Edwards
Executive Director

Newfoundland and Labrador became a chapter of CPAWS in 2003 with a mission to promote the systematic establishment of new terrestrial and marine protected areas and to foster effective governance of existing parks, protected reserves, and wilderness areas in the province. For the benefit of present and future generations, we envision the establishment of a representative system of terrestrial and marine protected areas that incorporates the ecological, social, and economic values of local communities and recognizes the importance of protected areas and wilderness as an essential part of ecosystems governance and planning.

CPAWS NL has worked on many projects throughout the province with many communities and various departments within both the provincial and federal governments. Since our creation, we have been urging the provincial government to release the long-overdue Natural Areas Systems Plan (NASP) and have also highlighted concerns that our environment has and continues to face in the absence of such a plan.

As recently as this week, Prime Minister Trudeau reiterated his government's commitment to protecting 25% of Canada's land and 25% of the country's oceans by 2025 and hitting the 30% mark on both fronts by 2030. Yet our province is still one of the lowest in the country when it comes to percentages of protected areas and continues to face opposition from the public and industry despite the fact that we are below the 17% benchmark for 2020.

According to the provincial government website, it states: "Knowing how important environmental health is to our survival and prosperity, the Province realizes that safeguarding our environment for the future is an important responsibility. Creating and maintaining a network of properly designed and legally designated "protected areas" is one of the key ways it intends to do its part to ensure the survival of Newfoundland and Labrador's natural heritage. But our natural environment and all the species and processes it supports-needs protection to be able to sustain us now, and into the future. This protection should be considered one of the most important land-uses of all. And so, establishing and maintaining a sound network of protected areas must be the foundation for future sustainable and responsible development in the province." (Government of Newfoundland and Labrador, 2020)

Furthermore, the Provincial Sustainable Forest Management Strategy 2014-2024 states, "The establishment of permanent protected areas such as wilderness and ecological reserves by the Department of Environment and Conservation (ENVC) is also an important component of ecosystem management. FAA supports the establishment of a network of protected areas in Newfoundland and Labrador and will work with ENVC to achieve this objective. (Government of Newfoundland and Labrador, 2014)

It is evident from these public statements that the provincial government recognizes protected areas are integral to the province to help biodiversity, and recognizes the need to work in collaboration with other sectors.

On a national level, Newfoundland and Labrador is actively engaged in protecting the environment through the Pathway to Canada Target 1 initiative. The Province is a member of the National Steering Committee, which facilitates and guides the efforts of conservationists across the country. Yet, there is still much reluctance to implement or move forward with protected areas in the province.

The proposed Protected Areas Plan, ***A Home for Nature*** is a starting point to help NL create a network of protected areas that can aid in adaptations for climate change, ecosystem representation and protect species at risk and biodiversity loss while allowing current traditional activities and continuation of potential resource extraction through its identified transitional reserves.

As a science based organization, CPAWS commissioned a report that assessed representation improvements, highlighted well and underrepresented gaps, and overlays with significant features and species in regards to existing and proposed candidate sites (See email appendix A for analysis and maps for each region).

Through this analysis, it was concluded:

- Proposed protected areas will improve the representation of many features in various subregions
- Proportional representation gaps exist in numerous ecoregions
- Former large provincial parks could be used to potentially fill protection and representation gaps in some subregions. For instance, the former Stag Lake Provincial Park in the Corner Brook subregion contains productive, older coniferous forests and American Marten habitat.
- Species of conservation concern such as Woodland Caribou would see additional habitat protection from the proposed protected areas, whereas American Marten habitat is already relatively well protected but would see some benefit.
- Most proposed sites are in areas of relatively high intactness. Recognition of the importance of intact landscapes for effective biodiversity protection needs to continue through processes such as the provincial Sustainable Forest Management Strategy. The Canadian Boreal Forest Agreement (CBFA) Benchmark Areas of Interest suggest additional intact areas that could help achieve protection targets.
- Continued attention needs to be paid to site-specific protection for fine-scale features including uncommon flora, critical habitats and special wetlands
- Explicit targets for overall and feature-specific protection should be developed to guide future protected areas planning and implementation. A broad base of input for such a process would also help build an understanding of protected areas generally.

Other Noteworthy points in regard to the proposed plan:

- The current proposed plan in addition to the existing ecological and wilderness areas, will begin a network and advance connectivity for the island.

- Watersheds including tributaries and headwaters would have further protection such as those in Cloud River and other areas throughout the province
- Completeness of habitat representation for species at risk

This report reaffirms the plan is important for the province and will make a difference.

CPAWS Observations of the “Home for Nature” Plan Process

CPAWS welcomed the release of the long overdue plan that has been sitting within the provincial government for over 25 years. The plan represents some of the best remaining natural areas in the province, including incredibly significant coastal seabird colonies, species-at-risk habitat, and important wetland habitat.

However, it is important to note that this plan was devised in the 80’s and as a result the demographics and the way we use the land has changed dramatically. Although there have been meetings internally within the various government departments during that time frame, the public was never engaged, and many didn’t even realize such a plan existed within government. When the plan was finally released on May 28th, 2020, many residents were (rightfully) alarmed and felt blindsided having not been part of the process, (defined by the WER ACT). The majority of residents of the province, all value our natural areas, enjoying the great outdoors for recreational activities and they have expressed concerns about wanting to continue their traditional activities and also allowing potential economic opportunities without restrictions.

Over the past few months, CPAWS NL have identified other contributing factors that may have influenced resistance to the plan including (but not limited to):

- A lack of endorsement and public comments from elected officials and or responsible Minister(s) - WERAC released the plan to the public under the direction of the minister yet the minister repeatedly referred to the plan as “WERAC’s Plan”. WERAC is an advisory committee to the government department and relevant ministers however, they were left to fill in the gaps to the public as much as possible. It would have been much more beneficial had the responsible minister(s) been more involved in the public release and the process.
- Having boundaries already identified on maps - Presenting maps to the public gives the impression that things are set in stone. It should have been clear that these were proposed boundaries and sites and open for discussion, so the plan did not appear as intimidating.
- Size of the document and Q&A- The size of both documents was very large so many people did not read the documents in its entirety. As a result, people skimmed or relied on local voices for their input, which is how misconceptions were devised.
- The initial short 30-day feedback window - the initial announcement provided a 30-day window to a plan that the public had no knowledge of and had never seen before. This set panic and fear into all residents that

- felt they would be affected by this plan. In many cases, people responded to the fear without ever reading the plan or what it meant. This resulted in an influx of negative submissions (mostly based on misconceptions and fear).
- Lack of pre-consultation with local stakeholders and residents - The public and stakeholders should have been prepared for the release of such an important provincial plan. Public education would have been hugely beneficial to help alleviate fears and misconceptions.
 - The timing of the plan was released during a world health pandemic and hard economic times for the province. People felt as though WERAC was trying to “sneak” and or “bury” the plan in the news in hopes people would not respond.

Even though the plan was devised based on science, it did not highlight economic outcomes directly and indirectly related to implementation of protected areas, or immediately addressing concerns from residents. At no fault of their own, WERAC was restricted from having meaningful conversations with stakeholders leading up to the release of the plan, as this would have lessened the misconceptions and fear that is now circulating.

There has been a lack of transparency regarding protected areas on behalf of the provincial government for over 25 years with the lack of public consultation regarding this plan, ongoing failure to commit to establishment of sites, shuffling the plan back and forth between departments, cutbacks to staffing and departments, and allowing industry to influence the outcome (for instance, transitional sites being included in the plan indicates industry has had an opportunity to provide input while the public did not).

There will always be opposition to any new plan, however, there is huge value and benefit to having a Protected Areas Plan and as a province of Canada, we are obligated to address biodiversity loss, climate change and species at risk while creating new protected areas.

CPAWS NL Phase 2 Recommendations

“A Home for Nature” is a good starting point in establishing a plan for new legislated protected areas for the island of the province. However, as WERAC moves into Phase 2, CPAWS NL recommends the following:

- Moving forward, to have the Responsible Minister(s) to jointly announce the next phase and provide support, alongside WERAC delegates. The plan needs to be endorsed and backed by the responsible Minister(s) during all phases. Transparency from the government is vital!
- Consultations - It has been a challenge to conduct meetings during these times within a global pandemic and moving forward it is anticipated the same will likely apply for the foreseeable future. Although WERAC aims to be inclusive and transparent, the public perception may vary. Thus, hiring a third-party consultant will allow non-partisan dialogue through virtual and in-person meetings which will allow WERAC to further devise

recommendations to the government. Furthermore, having a 3rd party should reduce conflict.

- Communications - When the plan was initially announced, there were many misconceptions about the plan and a lack of public outreach. Presenting the rationale of science-based facts of chosen areas will help those who oppose by providing some clarification of why those boundaries and sites were identified. It is important to also consider traditional knowledge of the land and choose boundaries based on this.
- Education - Human Footprint (See email Appendix B) - The attached maps clearly and vividly illustrate existing human impacts that are currently within the province. Maps such as these will educate the public on why these sites were chosen, why we need protected areas (and why we need them now!) and will demonstrate that our province is already fragmented with industrial activities, thereby increasing public support for setting aside space for nature.
- Economic Benefits - Highlight both the direct and indirect benefits of having Protected Areas in a region, highlighting opportunities for new businesses, eco-tourism, jobs, etc. I.e. In Canada, terrestrial parks, and associated visitor spending support 64,000 jobs, generate a return of 6:1 in GDP, and return 44% of government investment back in taxes (CPAWS, 2020). Protected areas also boost and diversify rural economies by attracting new residents and businesses to park “gateway” communities. (CPAWS Parks Report, 2020). It would aid in increasing support by highlighting tangible benefits protected areas can bring to local communities such as local rangers/steward opportunities, education interpreters, etc.
- Climate Change and Biodiversity Loss - Protected Areas contribute to climate change and help with biodiversity loss, however many people do not make the connection in the province. It is important to showcase the benefits and highlight what pressures can have on biodiversity in contrast to not having areas set aside.
- Industry Engagement - As seen from the map, industry and protected areas can coincide with each other as seen with the transitional zones. It's important to show this to the public that these concessions have been identified and made.
- United Nations and role - There has been a lot of “conspiracy” talks about a land grab and UN pressure on certain areas of the province. It is important to recognize this when speaking to the public as a “trigger” as “Land Grabs” and to ensure communications are set up in a way to eliminate these misconceptions. To highlight the intent of the plan is for the province and its residents, and not a way for the government to take away from the regions.
- Zoning - There has been much confusion about leases, trails, domestic woodcutting, and other traditional usages and how they will continue if sites are established. If WERAC is to garner support in various areas, clear definable zones enabling the continuation of these activities will have to be established with input from the public. There also needs to be more education on this.

- Indigenous representation - Indigenous Protected Areas (IPAs) should be identified and welcomed and to allow indigenous communities to lead this initiative with support from WERAC. This needs to be addressed in the new plan and encourage more Indigenous-led stewardship initiatives and active participation. Furthermore, the WER Act and other provincial legislation should be amended to include indigenous led protected areas.
- Mapping - Much of the concerns addressed by residents was fear of proposed boundary lines. Encourage residents to draw their own boundaries and identify restrictions on a map and then overlay with science may be a more welcomed approach.
- Co-Management of Areas - It is vital that stakeholders take initiative and be part not just of the development of the plan but further management. Having local steering committees will 1) engage locals 2) have representation 3) be the voice for that area 4) lead to a sense of pride and ownership 5) act as liaison between conflicting groups and voices. We are all stewards of the environment and have shared values.
- Federal Government Opportunities - During the next decade, Canada has committed to combat climate change and has set high standards for creating new protected areas. As a direct result, the province, while working in conjunction with stakeholders, should seek financial aid from such agencies to allow continuation of protected areas and address environmental concerns, thus allowing increased capacity to Natural Areas and to aid WERAC in proper consultation phases and communications for the foreseeable future.
- Other proposed sites - During phase 1, new sites have been put forth for consideration, these should be made public, addressed, and considered if it aids with connectivity of existing and proposed sites.
- Connectivity - Although the primary focus of this plan did not focus on connectivity, moving forward, more effort needs to be done so it's more representative.
- Timelines - It is imperative that the provincial government set deadlines to bring forth WERAC recommendations to Cabinet in a timely manner and to the public regardless of the outcome. A detailed timeline of consultations and processes should be publicly made. It is unacceptable to go through this consultation process without having a detailed timeline commitment by the government.
- WERAC representation - The provincial government needs to renew current members of the committee and seek representation from all regions of the province as well as an indigenous representative. Ongoing scheduled meetings must be held with open dialogue.
- Refer to other provinces - As this plan has been withheld for over 25 years, other provinces have and continue to update their provincial plans. Lessons learned from other provinces could aid NL in this new direction.

Summary

Evidence suggests that protected areas are the most effective tools for slowing the rate of biodiversity loss. As a province we have unique wildlife and plants

including 51 species, subspecies and populations listed under the Endangered Species Act. Setting aside space for nature, should be at the forefront of our provincial commitments to sustain our current environment.

Protected areas are one of the core ways to help us conserve nature, our species and their habitats. As we develop much of the landscape in our province for resource-based industries, we also need to create areas where the focus is on nature conservation. Creating this balance is fundamental to sustainable living in our province, not only for nature but for our own physical and mental health and well-being. They are areas dedicated to conserving nature and wildlife for current and future generations. They are places to experience and enjoy and learn about our natural and cultural heritage.

It has been over 25 years since this plan was originally created and even with the current candidate sites, we would still be one of the lowest in the country.

The time is now to make a difference! We need new protected areas within the province, to help combat climate change, species at risk, conserve unique ecosystems and reduce biodiversity loss. We cannot wait another 25 years to set aside space for nature, we need to do it now.

We need our provincial government to support this plan and allow WERAC to continue stakeholder engagement to identify boundary changes, accommodation of traditional activities and management options for the proposed reserves. We need to ensure that communities will benefit from the plan through economic opportunities, encourage indigenous led protected areas and protect our environment.

CPAWS supports the first Phase of the plan!

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