



SNAP

SOCIÉTÉ POUR LA NATURE ET LES PARCS DU CANADA

Brief submitted to the members of
COMEX

In the context of the
**Environmental Assessment of Proposed Logging Roads in Eeyou
Istchee, Including Proposed Extension of Road N-822 (Road *H*)**

By
SNAP Québec

February 2010

TABLE OF CONTENTS

INTRODUCTION	3
CHAPTER 1	
Gaps in the proponent impact study	3
CHAPTER 2	
Project impacts on woodland caribou, boreal population	8
2.1 Federal Science Report	8
2.2 Québec forest-dwelling woodland caribou recovery plan	8
2.3 Regional Context	8
2.4 Impact of road construction on caribou habitat in the Area of Interest	9
2.4a Nature Québec caribou study / protected area proposal	10
2.4b MRNF caribou blocks	11
2.4c Fortin et al. (2008) winter habitat	12
2.4d St-Pierre et al. (2006) report on forest-dwelling caribou	13
2.4e Joint Grand Council of the Crees and SNAP call for logging moratorium	14
CHAPTER 3	
Protected area proposals	15
3.1 Assinica national park project	15
3.2 Domtar FSC candidate protected area	15
3.3 Waswanipi protected area network proposal	15
3.4 Other protected area considerations	15
CHAPTER 4	
Increased access to the territory and cumulative impacts	17
CONCLUSION	18
BIBLIOGRAPHY	19
APPENDIX 1	20

INTRODUCTION

The Canadian Parks and Wilderness Society (CPAWS) is a non-profit organisation committed to wilderness protection. Since 1963, CPAWS has worked to protect wilderness by facilitating the creation of protected areas and by promoting better management of natural resources. CPAWS is composed of 13 regional Chapters throughout Canada, including its Québec Chapter: *La Société pour la nature et les parcs du Canada, Section Québec* (SNAP Québec).

SNAP Québec has worked on many issues with implications within and beyond Eeyou Istchee, including the reform of the Forest Act, the upcoming reform of the Mining Act, woodland caribou conservation, and specific protected area projects such as the ATO and Tursujuq national parks.

The present report is submitted to COMEX by virtue of Article 161 of the *Loi sur la qualité de l'environnement*, whereby third parties may provide comments to COMEX if permitted to do so by impacted Cree communities. The report aims to provide COMEX with complementary information on the suite of logging roads currently being proposed in Nord-du-Québec. While specific examples generally refer to road H, proposed in the Broadback River high conservation value area, where applicable the report should be interpreted as referring to all road projects currently under evaluation (termed “the Area of Interest” in this report), particularly those that represent significant incursions into intact primary forest (Roads A, F, G, H, I).

CHAPTER 1

Gaps in the proponent impact study

The intention of this chapter is to point out what SNAP considers to be significant gaps in the impact study provided by Domtar, AbitibiBowater, and Norbord for road H. Selected comments will be addressed in greater depth in later chapters. Information is presented in the table below.

Table 1. Gaps in the road H impact study

Impact Study (<i>Page in French version</i>)	Relevant MDDEP directives (French version)	SNAP comments
(P. 3) The first step in the construction of road H will be improvements to an existing 28km of logging road (beyond Km103 of road N-822).		This existing stretch is longer than 25 km and was built after 2005, when it was well known that the “Aires Communes” tenure system would be modified to the “Unités d’Aménagement Forestier” system. The promoter should explain why the original construction of this 28 km road was not subjected to environmental assessment.
(P. 10) The promoter states 252 500m ³ as the attributed volume for UAF 86-66.	<i>Description du projet</i>	The promoter should state the proportion of this attribution that is located north of the Broadback, and how much will be made accessible by this project.
(P. 12) The report does not state the volume of wood which will be harvested for the road construction proper.	<i>Domtar devra décrire les travaux de déboisement prévus pour la construction de la route, y compris les volumes de bois à couper</i>	The promoter must include this information.
(P. 13) The Chensagi bridge over the Broadback will be built in 2010.	<i>Le promoteur doit inclure le calendrier des travaux</i>	The month of bridge construction should be specified because of potential impacts on several fish species. In 2009, the promoter intended to begin construction of bridges earlier than the usual time window.
(P. 14) Appendix 13 (and associated text) shows the traplines which will be closed to logging as the primary justification for the need to initiate this project in 2010.	<i>Justification du projet</i>	In order to properly assess the need to initiate this project in 2010, the promoter should: <ol style="list-style-type: none"> 1) Justify the projected year of trapline closures in Appendix 13 (i.e. whether allocated volumes will indeed be fully harvested). 2) Specify the minimum harvest area (and volume) per trapline north of the Broadback, according to the current management strategy, and indicate in what year these volumes are to be harvested. 3) Show, as per Appendix 13, the volumes available per trapline, in all of 86-66 and other UAFs where the promoters operate. This should be assessed in order to evaluate alternatives to the

Impact Study (<i>Page in French version</i>)	Relevant MDDEP directives (French version)	SNAP comments
		<p>project.</p> <p>4) Justify why construction must begin in 2010, if traplines south of the Broadback remain open until at least 2012.</p>
<p>(P. 15) The promoter does not provide a cost-benefit analysis as required by the MDDEP, stating that the project represents a “cost” rather than an “investment”, for which such an analysis would be necessary.</p>	<p><i>“Domtar devra justifier les investissements requis par une analyse de coûts-bénéfices. Il devra notamment considérer la valeur économique des bois exploités en comparaison avec les coûts de construction et d’entretien de la route en plus des autres coûts assumés par la compagnie, d’autres partenaires, ou les gouvernements... »</i></p>	<p>The project cost is estimated at 10M \$, which the promoter insists is necessary to maintain the economic viability of operations. Under these circumstances the promoter should perform a cost-benefit analysis, including at the very least:</p> <ol style="list-style-type: none"> 1) An estimate of the economic value of the volumes to be harvested north of the Broadback, including a scenario where part of the area would be protected, as anticipated by the promoter (P. 5). 2) An estimate of the cost of renovating the existing Hydro-Québec bridge, and a revised estimate of the 4M \$ “detour costs” incurred by using this bridge, under a scenario where part of the territory would be protected, as anticipated by the promoter. 3) The proportion of project costs assumed by government programs.
<p>(P. 10, 15, 22, 29) The promoter suggests that the road use and occupation of territory associated with the extension of N-822 would be minimal, and that no substantial developments are expected after the project.</p>	<p><i>Le promoteur doit décrire « le trafic routier anticipé relié aux activités forestières et aux activités des autres utilisateurs », « l’occupation actuelle et prévue du territoire, y compris les baux de villégiature », ainsi que « les effets d’entraînement sur la demande de nouveaux baux de villégiature »</i></p>	<p>The survey data used to provide this analysis is nearly a decade old. SNAP believes that the promoter’s assessment is unrealistic, and that increased access and traffic should not be dismissed as risks associated with this project – particularly since the road will provide direct access to the Broadback itself and to the Category III lands to the north. The promoter should also document any mining claims which will be made accessible by this project.</p>
<p>(P. 16) Annex 14 illustrates a protected area proposal sponsored by Domtar as part of an FSC certification. It makes no mention</p>	<p><i>Le promoteur doit indiquer “la présence d’aires protégées ou projetées”, ainsi que “les projets à l’étude dans la région dont la réalisation pourrait se faire à court ou</i></p>	<p>The promoter should indicate whether it intends to respect the FSC protected area proposal, and justify the western portion of the road project based on this proposal. It should also describe consultations with Waswanipi concerning its protected area proposal.</p>

Impact Study (<i>Page in French version</i>)	Relevant MDDEP directives (French version)	SNAP comments
of an existing protected area network proposal submitted to MDDEP by the community of Waswanipi.	<i>à moyen termes</i> ”.	
(P. 18) Information on fish habitat specific to the Broadback River crossings is not provided nor mapped.	<i>Le promoteur doit indiquer « l'emplacement des habitats potentiels ou confirmés pour la reproduction, l'alevinage et l'alimentation des poissons, et ce, aux points de traversée des principaux cours d'eau ».</i>	The promoter should map fish habitat around the proposed bridge sites, and adapt operations accordingly.
(P. 23) The promoter has asked MDDEP that a 100m corridor be withdrawn from the future Assinica park's boundaries to accommodate the roads for the Broadback crossing.	<i>Impacts associés au projet</i>	The promoter should indicate whether the Cree negotiators for the Assinica park were consulted on this decision.
(P. 25) The promoters suggest taking certain measures to reduce the road construction's impact on caribou habitat.	<i>Mesures d'atténuation</i>	Given the avoidance of infrastructure displayed by woodland caribou, particularly during construction, the scale and scope of the proposed mitigation measures are inadequate.

Impact Study (<i>Page in French version</i>)	Relevant MDDEP directives (French version)	SNAP comments
(P. 27) The promoter states that « river crossings are the only significant impact of the project », and will therefore be implementing a 3-year monitoring programme of the bridges only.	« <i>Le programme de suivi a pour but de vérifier sur le terrain la justesse de l'évaluation des impacts pour lesquels subsiste une incertitude pouvant entraîner dans le futur des conséquences nuisibles sur l'environnement</i> ».	Given that no measures exist for woodland caribou habitat conservation in this UAF, and that the road project will fragment prime caribou habitat, the promoter should propose a monitoring programme to document the extirpation of caribou in the project area. Road use should also be documented.
(P. 29) Domtar does not report any consultations with the outfitting operation on Lake Evans (Americree)	« <i>Indiquer les avis et les préoccupations exprimées. Indiquer comment ces interprétations ont été prises en compte et intégrées lors de la détermination du corridor ainsi que dans l'étude d'impact.</i> »	SNAP has learned that the outfitting operation is opposed to the project. Its concerns should be included in the report.

CHAPTER 2

Project impacts on woodland caribou, boreal population

2.1 Federal Science Report

Forest-dwelling woodland caribou are federally listed as threatened. In 2009, Environment Canada published the *Scientific Review for the Identification of Critical Habitat for Woodland Caribou, Boreal Population (Rangifer tarandus caribou) in Canada*. This report is considered the most up-to-date scientific information on the state of caribou throughout Canada, and will feed into the federal recovery plan for the species under the *Species at Risk Act*. Below are the key conclusions of the report as they relate to the Area of Interest, where the roads are being proposed:

- The proper scale at which caribou management and critical habitat identification must occur is the “local population range” (and not sub-delineations such as calving grounds or winter habitat).
- Several jurisdictions with large continuous areas of occupied habitat (including the Area of Interest) have not completed local population delineation and therefore only provided extent of occurrence for continuous distribution areas. Local population delineation for these areas is a high priority.
- The scientists’ recommendation for the Area of Interest is labelled “current range”, meaning that “*current range condition and extent are required to maintain potential for a self-sustaining population. Further degradation of the current range may compromise the ability to meet the recovery goal*”. Population units should be identified and assessed (see above), which could lead to alternative outcomes.

2.2 Québec forest-dwelling woodland caribou recovery plan

Forest-dwelling woodland caribou is provincially listed as vulnerable. The Québec government officially published the provincial boreal woodland caribou recovery plan in 2009 and formed a multi-disciplinary recovery team tasked with implementation. The plan contains 30 actions to undertake to achieve recovery, one of which (measure 17) is specific to environmental assessments. The recovery plan names MDDEP, MRNF, JBACE, and Environment Canada as the entities responsible for implementing this measure, which states that assessments must:

- 17.1 Recognize the forest-dwelling caribou as a target species;
- 17.2 Consider the cumulative impact of the interventions on the habitat of the forest-dwelling caribou.

« It is likely that large-scale projects, whether industrial or other, requiring recourse to environmental assessment studies, will eventually be tabled in the area of application of the Recovery Plan. It will be important to make sure that the forest-dwelling caribou is identified as a target species so that the precarious situation of this species is taken into consideration in the environmental impact assessment and review process. The impacts of already authorized activities should also be considered. This action may lead to changes to projects being examined or to the implementation of mitigation measures to make the work compatible with the requirements of the forest-dwelling caribou. »

Contrary to measure 17, the promoter does not recognize the cumulative impacts of this project on woodland caribou, including already authorized activities.

2.3 Regional Context

It is generally recognized that forest management in FMUs subjected to the Paix des Braves agreement is not wholly compatible with maintaining adequate caribou habitat. Contrary to other caribou “hotspots” in the province, 2008-2013 forest management plans (PGAF) in this area

have no specific measures to address caribou habitat, nor are there complementary measures in place (e.g. Saguenay – Lac St-Jean is upholding a moratorium on new roads and dwellings in caribou “protection” and “replacement” blocks). To date there is no regional strategy involving “protection” and “replacement” blocks (measure 7 of the provincial Recovery Plan) in the Area of Interest. Discussions with individual companies may eventually lead to pilot projects to implement such a caribou management strategy, but would involve exemptions from certain articles of the Paix des Braves. In the meantime, the MRNF has stated that “the caribou strategy in this area is based on habitats north of the commercial limit for forestry, and on the future Assinica park, the boundaries of which are not finalized”. Therefore, **the road projects under evaluation are proposed in an area of high caribou occurrence, one of the only such areas in Québec’s commercial forest that is currently not subjected to any measures for maintaining caribou habitat.**

SNAP believes that a scientifically-sound caribou management strategy is possible in Paix des Braves FMUs. Large protected areas should be at the core of this strategy, and adapted forest management must be developed and put into practice. Neither element is present at the moment.

2.4 Impact of road construction/corridors on caribou habitat in the Area of Interest

The impact of road projects on caribou habitat must be viewed in terms of cumulative impacts at the local population range scale, including the anthropogenic disturbances that will inevitably arise from the presence of roads. Chapter 4 further deals with cumulative impacts.

The purpose of this section is to illustrate the most immediate impacts of the roads on caribou habitat, with a focus on the road corridors themselves. Based on the best available science, boreal woodland caribou can display an avoidance of 9 - 13 km of forestry operations (Smith *et al.*, 2000; Schaefer & Mahoney, 2007; Vors *et al.*, 2007) and 0.25 - 4 km of roads (Dyer *et al.*, 2001; Nellemann *et al.*, 2003). The following section includes maps to illustrate various datasets of prime caribou habitat and/or occurrences, with respect to the proposed road corridors. Based on the numbers above, and considering the logging operations required to open the road corridors, we have selected to illustrate road projects with a 5 km caribou avoidance area.

SNAP’s requests to MRNF for information on specific caribou occurrences (collar data) in the area have been repeatedly turned down – most recently when requested for use in the present environmental assessment (Access to Information request denied on December 21st, 2009).

Incursion of proposed roads into
Nature Québec large caribou habitat block

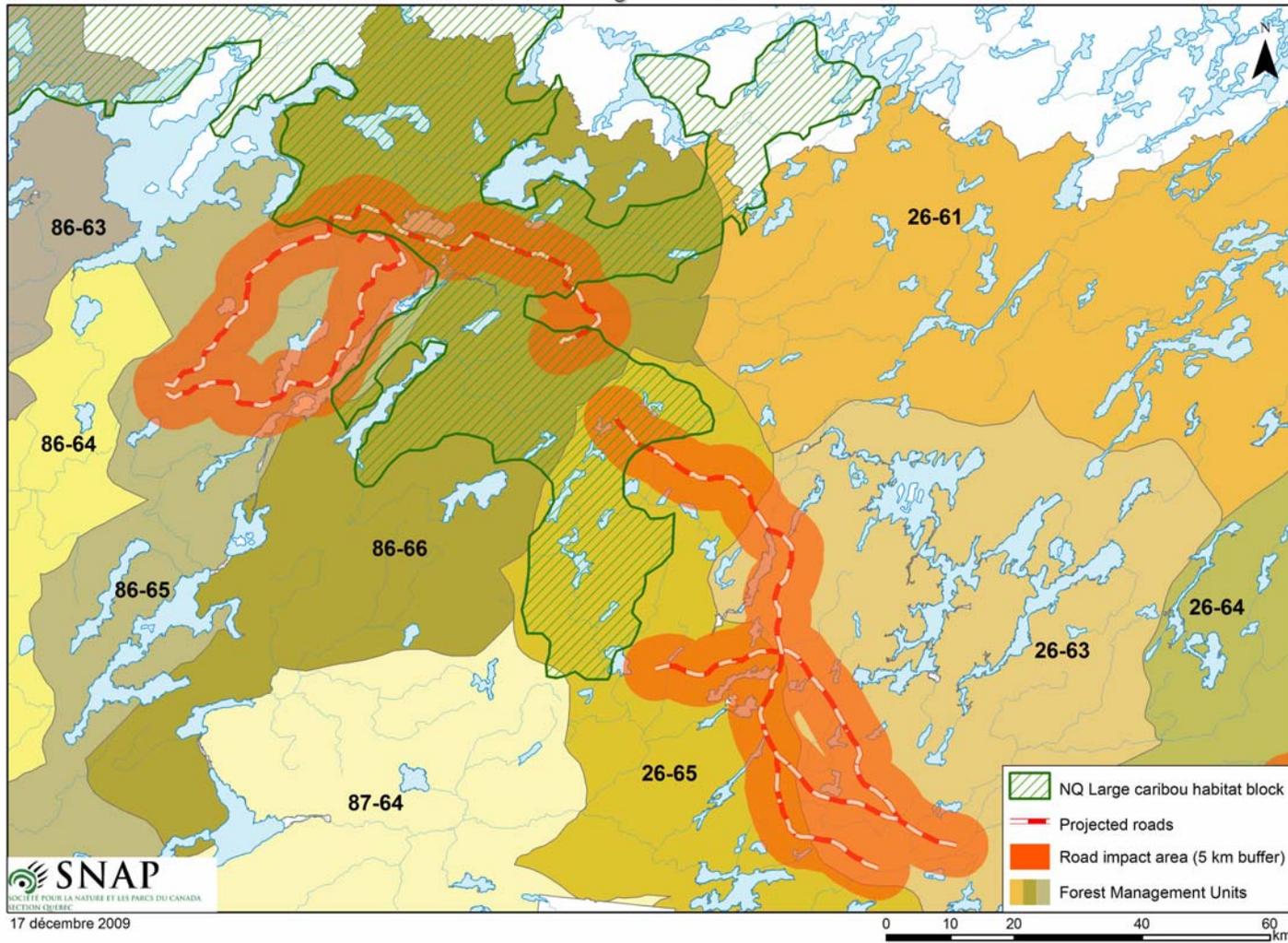


FIGURE 1.

2.4a Nature Québec caribou study / protected area proposal

In 2007, Nature Québec produced an extensive report aimed at identifying the areas of prime habitat for forest-dwelling caribou within the continuous area of distribution. This analysis led to the identification, province-wide, of five sites with prime habitat in a contiguous block of 5000 km² or more. These sites were proposed as protected areas (Nature Québec, 2007b). Of the five, only one is located in the western half of Québec. The proposed logging roads in the Area of Interest are partly located within this area of prime habitat.

Incursion of proposed roads into MRNF Caribou protection blocks

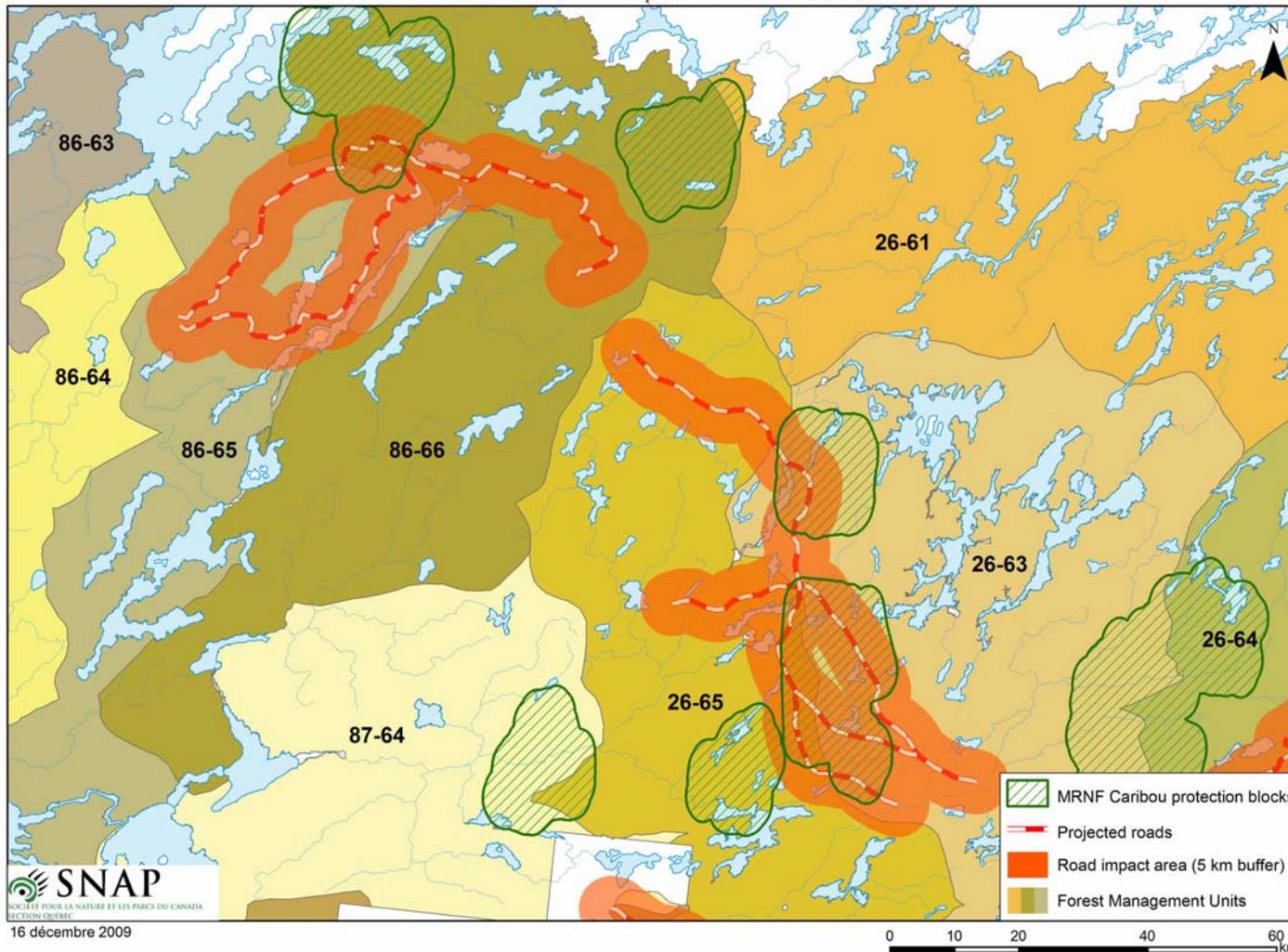


FIGURE 2.

2.4b MRNF caribou blocks

In considering possible caribou management strategies for the area of interest, MRNF (Region 10) devised a series of potential “caribou protection blocks”. It is SNAP’s understanding that these blocks were temporarily subjected to a logging moratorium, which was lifted in the Spring of 2009. The location of these blocks undoubtedly reflects areas of high caribou occurrence according to MRNF data, but must not be considered as an exhaustive picture of caribou distribution in the area. Figure 2 shows the incursion of proposed logging roads into these MRNF caribou blocks.

Incursion of proposed roads into
Caribou winter habitat (Fortin et al. 2008)

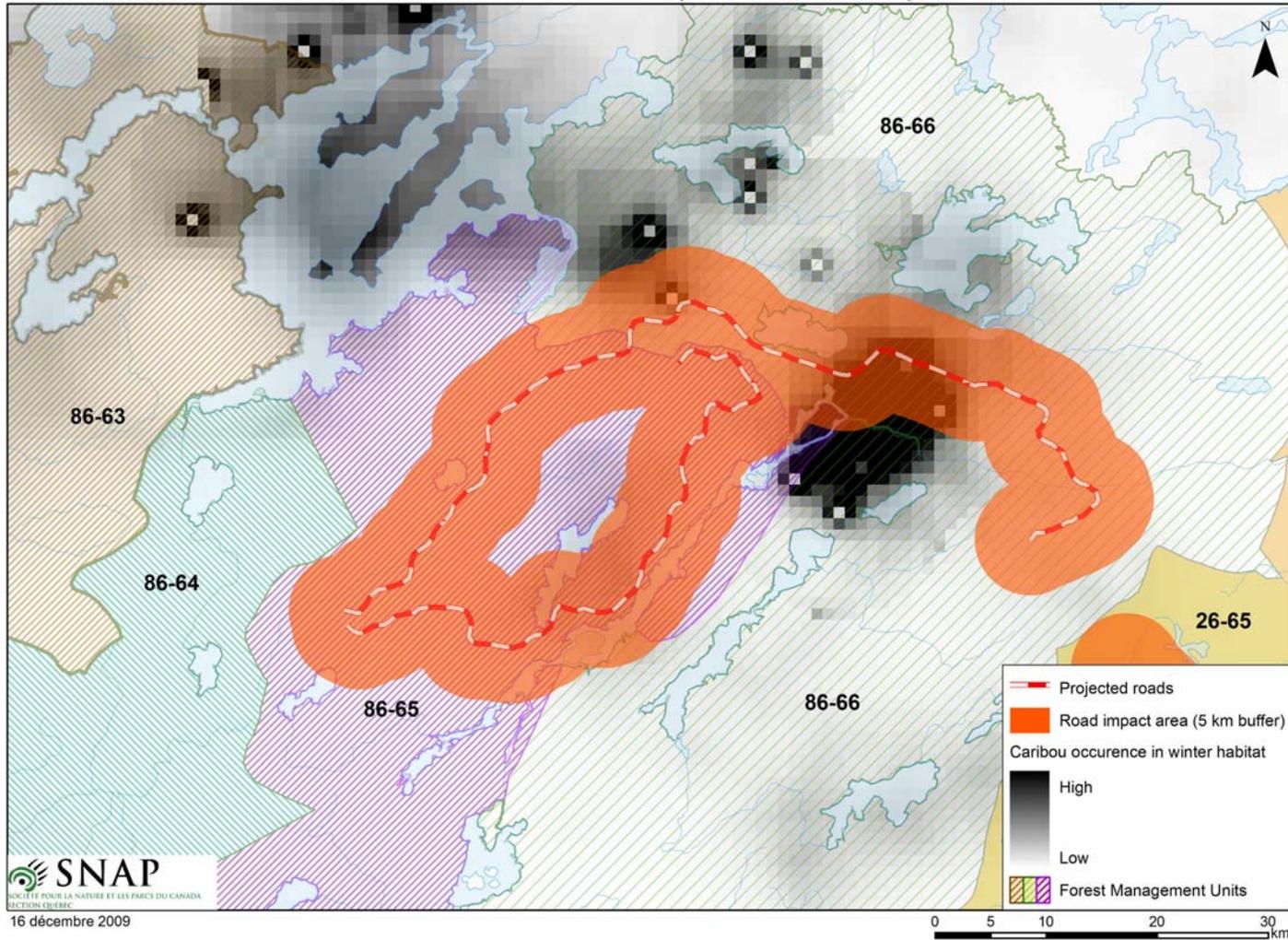


FIGURE 3.

**2.4c Fortin et al. (2008)
winter habitat**

From a series of aerial surveys conducted between 1999 and 2005, Fortin et al. (2008) identified prime wintering grounds for forest-dwelling caribou in the area of interest. Figure 3 shows the incursion of proposed logging roads into some of these wintering grounds. Note that while informative, wintering grounds must not be considered as an exhaustive picture of caribou distribution in the area, and is only a subset of the “local population range” at which management decisions should take place (see Section 2.1).

Incursion of proposed roads into
Proposed caribou blocks (St-Pierre et al. 2006)

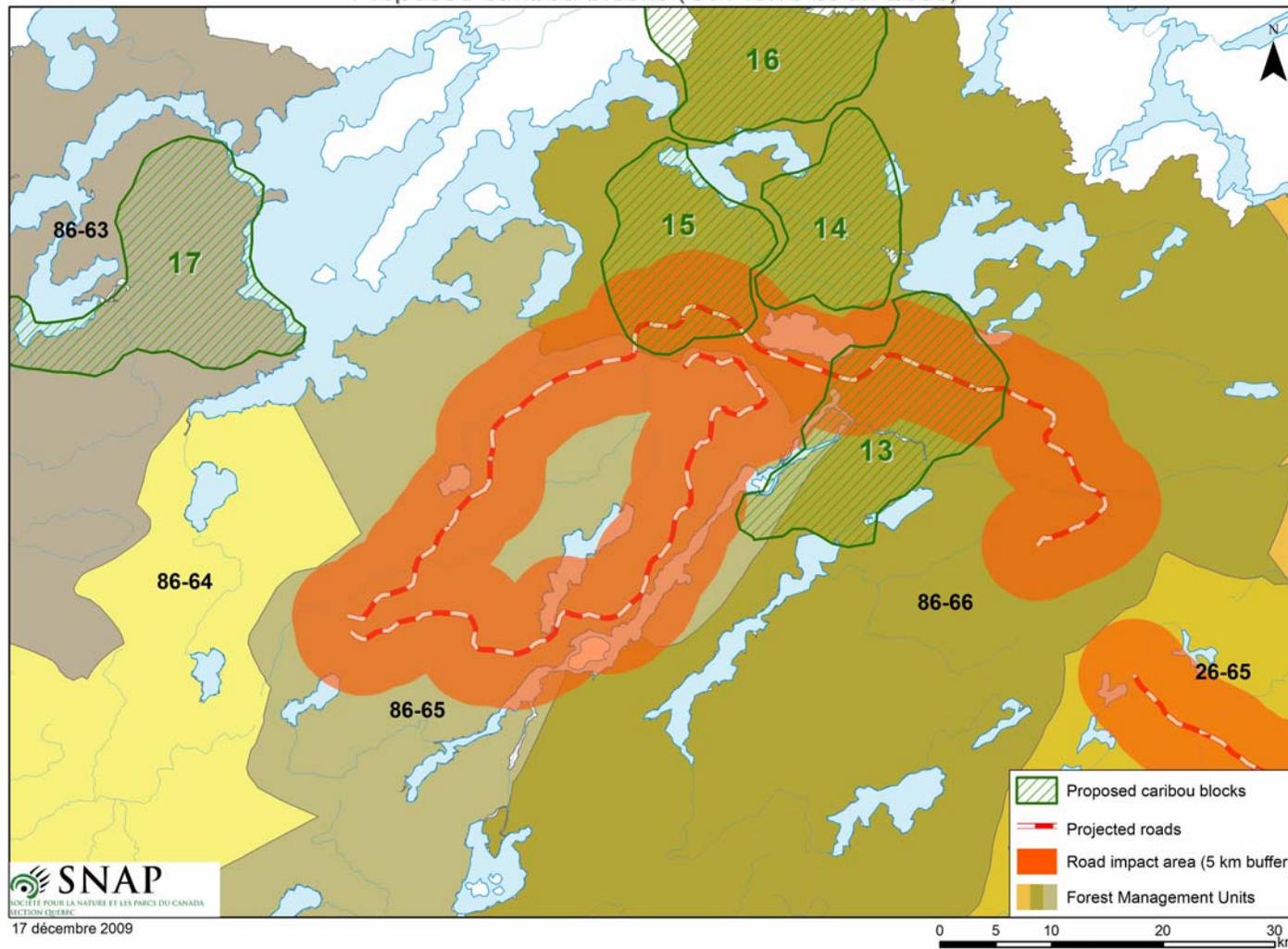


FIGURE 4.

2.4d St-Pierre et al. (2006) report on forest-dwelling caribou

In 2006, St-Pierre et al. completed a report (unpublished) entitled “*Impact des modalités d’intervention forestière de l’entente Québec-Cris sur le caribou forestier*”. The report was made available to CRA (N. Saganash, pers. comm.). Conclusions are based on aerial and telemetric studies (collar data) of forest-dwelling caribou in the area of interest, mostly sampled between 2002 and 2005. The report identifies candidate “protection blocks”, “sensitive sites from which forestry operations should be excluded”. Figure 4 shows the impacts of proposed logging roads on some of these blocks, namely blocks 13 (Théodat; 265 km²), 14 (Storm, 124 km²), and 15 (Rivière Storm; 175 km²).

Incursion of proposed roads into
Grand Council / SNAP logging moratorium demand

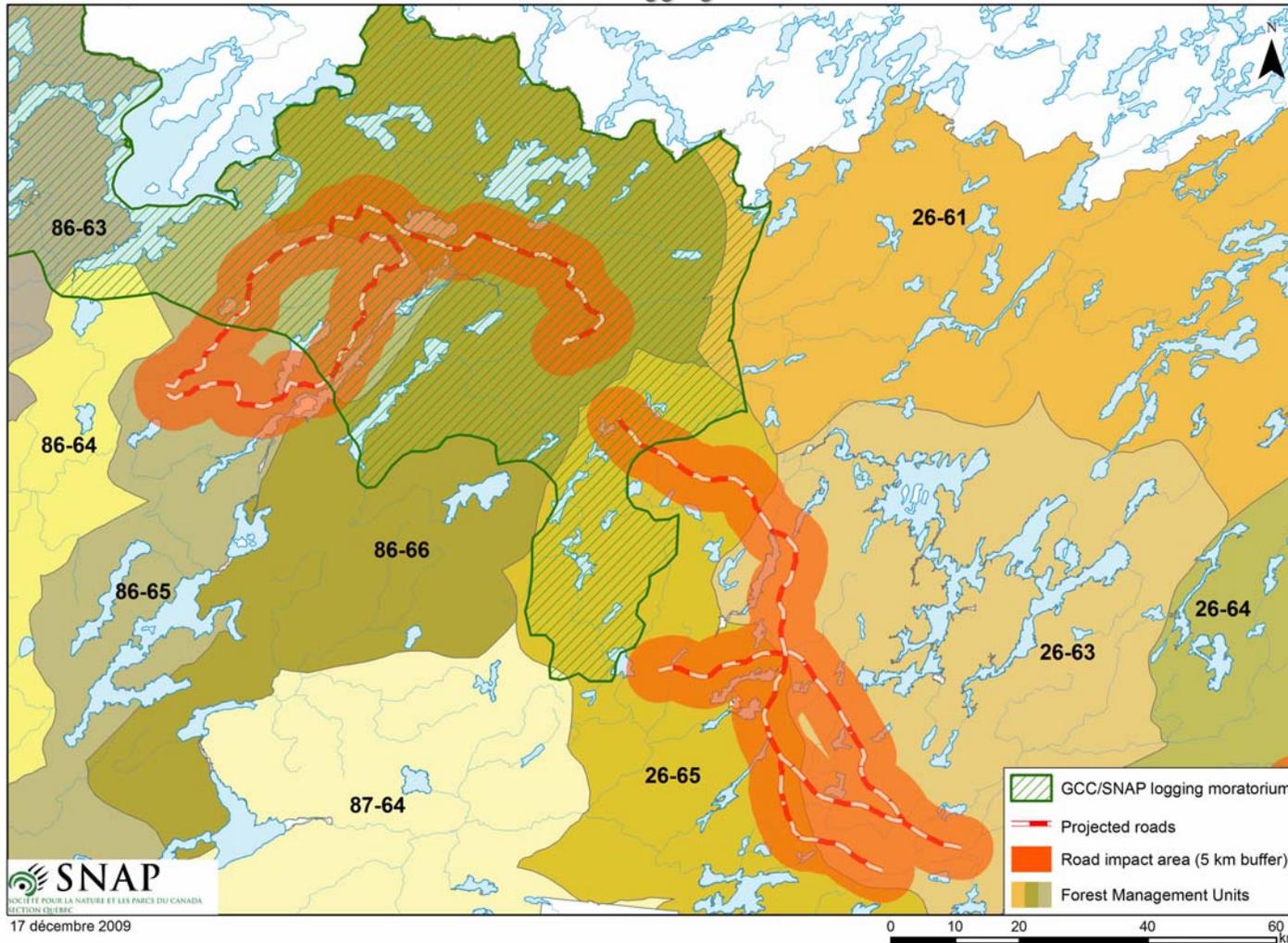


FIGURE 5.

2.4e Joint Grand Council of the Crees and SNAP Québec call for logging moratorium

In April 2009, the Grand Council of the Crees and SNAP Québec jointly called for a moratorium on logging-related activity in the area shown in Figure 5. This demand was based on the best available information on caribou and caribou habitat distribution in the Area of Interest, including that discussed in this chapter, and the lack of implemented provincial and regional caribou strategies in the area. (See Appendix A for the press release of this announcement).

CHAPTER 3

Protected areas proposals

Because of the very high conservation value of the Area of Interest, including: the presence of large intact forest blocks, mature forests, caribou habitat, and sites of cultural importance, there are several protected area projects (at various stages of implementation) in the area.

3.1 Assinica national park project

The creation of the Assinica national park is addressed in Schedule G of the Paix des Braves. The provincial government has committed to announcing this park by 2011, as part of the five national parks that are to be created in northern Québec. Although final park boundaries are still being discussed and have not been finalized, some of the proposed logging roads are intruding directly within the provisional boundaries. To this effect, the promoters have requested to MDDEP that a 100m- wide corridor be provisionally excluded from the park to allow for the passage of road H (page 23). It is unclear whether the Cree proponents of the Assinica park have agreed to this proposal. In any case, the effects of this road and its use will affect ecological integrity within park boundaries (e.g. caribou avoidance area, see Figure 6), particularly if anticipated traffic projections are realized (upwards of 27 000 annual passages; page 10).

3.2 Domtar FSC candidate protected area

As part of its FSC certification of Domtar Matagami FMUs 83-63 and 83-64, Domtar has proposed the “Broadback” candidate protected area (duly submitted to MDDEP; see Figure 6). The effects of proposed logging road H on caribou (5 km avoidance corridor) will be felt within the boundaries of this candidate protected area. Furthermore, respecting this protected area proposal (as committed to by Domtar) means that the 26 km segment of logging road H between Lake Storm and the Passage des Corbeaux bridge has **no potential to serve as an access road for logging to the north**, since it is narrowly confined between the Broadback River, Lake Storm, and the proposed protected area.

3.3 Waswanipi protected area network proposal

The community of Waswanipi has a long-standing proposal (duly submitted to MDDEP) to protect a network of ecologically and culturally significant waterways in the area of interest, in addition to a large sector north of the Broadback River known as the Mesikamis Virgin Forest. As shown in Figure 6, some of the proposed logging roads are either intruding directly within the proposed protected area network boundaries, or their effects on caribou (5 km avoidance corridor) will be felt within these boundaries.

3.4 Other protected area considerations

As discussed in section 2.4a, Nature Québec has proposed a large protected area in the Area of Interest, based on the presence of a large block of contiguous caribou habitat (Figure 1). Recently, the Cree Nation of Nemaska has also endorsed the creation of a protected area in the Lake Evans – Broadback River corridor. Finally, while not considered protected areas in the legal sense, at least two 1% areas identified under Paix des Braves modalities are located directly in the path of proposed logging road H (not mapped to respect tallyman confidentiality).

The broad support for a large protected area in the territory north of the Broadback is the primary motive for SNAP’s opposition to the road H project, particularly the intention to commence construction of the Chensagi bridge in 2010. Given current governmental objectives (12% of the province is to be protected by 2015, and 50% of the territory north of the 49th is to be excluded from industrial development), development should not be allowed in an area of virgin forest which has a high likelihood of being protected in the short to medium term.

Incursion of proposed roads into protected areas proposals and projects

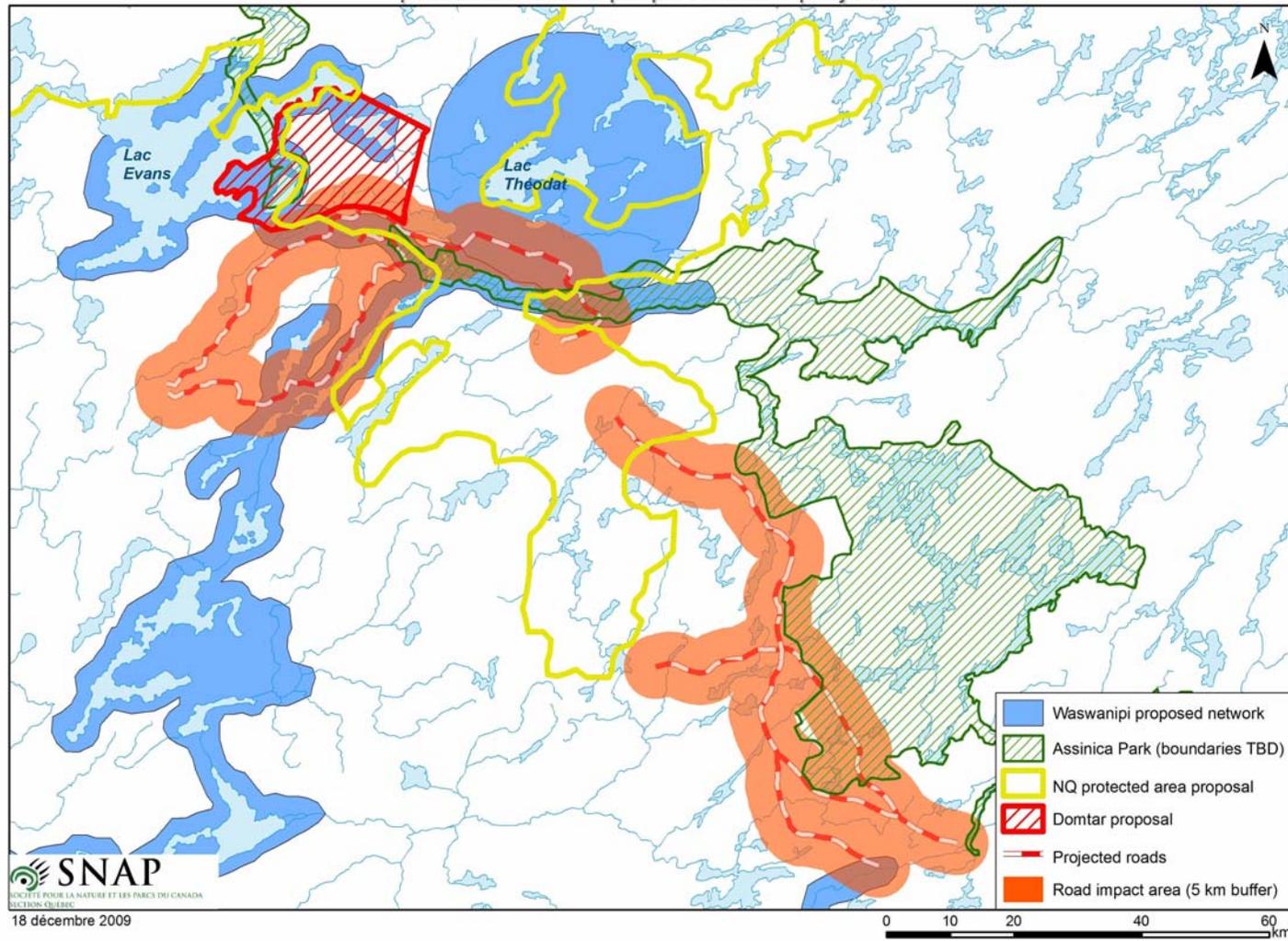


FIGURE 6.

CHAPTER 4

Increased access to the territory and cumulative impacts

The James Bay Advisory Committee on the Environment has requested that the social and environmental impacts of the proposed roads be evaluated by taking into account cumulative impacts in an integrated, regional context, not by limiting the study to the road “corridors” themselves. SNAP is in full support of this position. While such an in-depth evaluation is beyond the scope of this report, which aims to address the evaluations in their current (limited) scope, a few elements should be noted at present:

- Uncontrolled access to the territory is an ongoing, unresolved concern for many Cree stakeholders. SNAP disagrees with the promoter’s assessment that logging road H will not aggravate this problem. The illegal construction of camps and cabins has proven very difficult to manage in the area already impacted by logging. For example, traplines W05C and W09 located south of the Broadback are both located primarily within Category II lands (non-native vacation leases are forbidden), yet at least 6 illegal structures were counted within these traplines during the last field survey in 2003-2004. Logging road H will provide access to Category III lands north of the Broadback River, where more camps and cabins are to be expected.
- There are also implications for woodland caribou conservation. Previous studies have suggested 4 structures /100 km² (Nature Québec, 2007c) as an upper threshold for cabin density that can be tolerated by caribou. With no strict control over access, this threshold could easily be exceeded in the areas made accessible by the proposed logging roads.
- The road will provide direct and irreversible access to traplines W05A and W05B, two of the only three Waswanipi traplines (52 in total) that have not been impacted by forestry, perhaps the best area for carrying on activities related to the traditional Cree way of life.
- The cumulative impacts of road projects such as these should be considered not only in a regional, but also in a provincial context. Overall, thousands of kilometres of logging roads are added to the provincial network every year. These roads are typically planned just a few years in advance, with no over-arching vision and no strategy to maintain some roadless areas. Québec has been criticized for its poor management of logging road density, compared with provinces such as Ontario and British Columbia (Coulombe *et al.* 2004; Bourgeois *et al.* 2005).

CONCLUSION

The broad support for a large protected area in the territory north of the Broadback is the primary motive for SNAP's opposition to the road H project at this time, particularly the intention to begin construction of the Chensagi bridge in 2010. Given the importance of this area, and current governmental objectives (12% of the province is to be protected by 2015, and 50% of the territory north of the 49th is to be excluded from industrial development), it seems absurd that a 10M \$ infrastructure project would be launched to provide irreversible access to an area of virgin forest which has a high likelihood of being protected in the short to medium term. The promoter recognizes this possibility for the western half of the territory (page 5), but this is also true of the eastern half. Furthermore, it is impossible to verify the promoter's claim that construction must begin in 2010 to maintain economic viability, given that **a cost-benefit analysis has not been performed as required by MDDEP**. Finally, there are significant outstanding concerns with respect to the impacts of this project on woodland caribou habitat, since this is **one of the only areas of high caribou occurrence in the commercial forest that is not subjected to any measures for maintaining caribou habitat**.

SNAP is opposed to these projects going forward at this time, particularly road H, due to the issues outlined in this report. SNAP encourages COMEX to recommend that these projects not be allowed until:

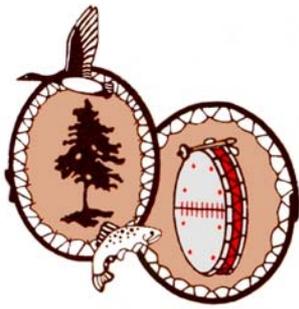
- 1) The gaps in impact studies have been addressed by the promoters of road H, and similar gaps addressed by the promoters of all other roads (Chapter 1).
- 2) The gaps outlined by the federal science report on caribou for the area of interest have been addressed. (Section 2.1).
- 3) Measure 17 of the Québec caribou recovery plan has been implemented for the environmental evaluation of the projects (Section 2.2; Chapter 4).
- 4) A scientifically sound, region-specific caribou management strategy has been proposed, evaluated, and implemented (Section 2.3).
- 5) Accurate and up-to-date MRNF data on caribou is made available and analyzed by stakeholders, including CRA and communities (Chapter 2).
- 6) The regional protected area network is completed, including Assinica park and other outstanding proposals (Chapter 3).
- 7) The cumulative environmental and social impacts of these projects are assessed, at least at a regional scale (Chapter 4).
- 8) All possible options for promoters to obtain wood elsewhere (particularly to avoid the area north of the Broadback River) have been exhausted. Promoters must engage with the *Bureau du Forestier en Chef*, MRNF, and neighbouring tenure holders (including AbitibiBowater Comtois, Barette Chapais, Chantiers Chibougamau, and Domtar Matagami) to assess alternatives.
- 9) The Grand Council of the Crees lifts its call for a logging moratorium in the Area of Interest (Section 2.4).

While we reiterate that SNAP is opposed to these projects going forward at this time, we acknowledge that the potential impacts of the different road projects are not equal. We consider road H to be the most problematic. Roads F, G, and I are also of very high concern. The others are preoccupying, but do not represent the same level of incursion into intact forests, caribou habitat, and protected area projects. Nevertheless, the above recommendations must be considered in a broad, regional context, and include all roads. Allowing limited elements of major projects to go forward (e.g., prohibiting the Passage des Corbeaux bridge on road H but allowing the Chensagi bridge to go forward) will not adequately address the issues outlined in this report.

BIBLIOGRAPHY

- Bourgeois L., D. Kneeshaw, and G. Boisseau. 2005. *Les routes forestières au Québec : les impacts environnementaux, sociaux, et économiques*. VertigO, 6 : 2.
- Comité de rétablissement du caribou forestier au Québec. 2008. *Plan de rétablissement du caribou forestier (Rangifer tarandus) au Québec – 2005-2012*. Ministère des Ressources naturelles et de la Faune. 74 pages and appendices.
- Coulombe G., J. Huot, J. Arsenault, É. Bauce, J.-T. Bernard, A. Bouchard, M.-A. Liboiron, and G. Szaraz. 2004. *Commission d'étude sur la gestion de la forêt publique québécoise (Rapport Coulombe)*. 307 pages.
- Dyer S. J., J. P. O'Neil, S. M. Wasel and S. Boutin. 2001. *Avoidance of industrial development by woodland caribou*. Journal of Wildlife Management, 65: 531-542.
- Environment Canada. 2008. *Scientific Review for the Identification of Critical Habitat for Woodland Caribou (Rangifer tarandus caribou), Boreal Population, in Canada*. 72 pages and 180 page appendices.
- Nature Québec. 2007a. *Revue de littérature des connaissances sur le Caribou forestier*, réalisée dans le cadre du projet « Critères et propositions d'aires protégées pour le Caribou forestier », 24 pages.
- Nature Québec. 2007b. *Propositions d'aires protégées pour le Caribou forestier*, réalisé dans le cadre du projet « Critères et propositions d'aires protégées pour le Caribou forestier », 68 pages and appendix.
- Nature Québec. 2007c. *Méthodologie d'identification de secteurs favorables à la conservation du Caribou forestier*, réalisée dans le cadre du projet « Critères et propositions d'aires protégées pour le Caribou forestier », 36 pages and appendix.
- Nellemann, C., P. Jordhøy, O. G. Støen, O. Strand and A. Newton. 2003. *Progressive Impact of Piecemeal Infrastructure Developments on Wild Reindeer*. Biological Conservation, 113: 307–317.
- Schaefer, J. A. and S. P. Mahoney. 2007. *Effects of progressive clearcut logging on Newfoundland caribou*. Journal of Wildlife Management, 7: 1753–1757.
- Smith, K. G., E. J. Fitch, D. Hobson, T. C. Sorenson and D. Hervieux. 2000. *Winter distribution of woodland caribou in relation to clear-cut logging in west-central Alberta*. Canadian Journal of Zoology, 78: 1433-1440.
- Vors, L. S., J. A. Schaefer, B. A. Pond, A. R. Rodgers and B. R. Patterson. 2007. *Woodland caribou extirpation and anthropogenic landscape disturbance in Ontario*. Journal of Wildlife Management, 71: 1249-1256.

APPENDIX 1 (see section 2.4e)



Enough is Enough: Crees and Conservation Group Call for Moratorium on Forestry Development in the Habitat of Vulnerable Woodland Caribou

Nemaska, April 30 2009. The Grand Council of the Crees (Eeyou Istchee) and the Canadian Parks and Wilderness Society (CPAWS – Québec) are jointly demanding an immediate halt in forestry development in the habitat of vulnerable woodland caribou, until their common concerns can be addressed by Québec. The call comes following last week’s release of the provincial woodland caribou recovery strategy, published three years behind schedule by the Ministère des Ressources naturelles et de la Faune (MRNF). The strategy proposes actions to recover caribou populations, with the objective of “maintaining current caribou distribution throughout Québec”. Ironically, MRNF is now preparing to approve a series of major roads and logging operations in some of the last virgin forests of the Cree territory – an area of important woodland caribou habitat that both Crees and environmental groups agree must be protected.

Exceptional ecosystems

The area targeted for the moratorium, in the vicinity of the Broadback River and Lake Evans (see attached map), is a critically important sector of virgin boreal forest thus far spared by industrial development. These intact forests are needed to maintain biodiversity and fully functional forest ecosystems, including habitat for threatened woodland caribou. According to Patrick Nadeau, Forest Program Manager at CPAWS – Québec: *“Research has shown that large blocks of undisturbed forests are critical to the survival of woodland caribou and this area is among the most promising for the protection of woodland caribou in the province. We have been actively campaigning to see this territory included in a “caribou belt” formed by large interconnected protected areas”.*

Reckless development

Bill Namagoose, Executive Director of the Grand Council of the Crees explains: *“Québec is pushing the clearcutting of more forest ahead of its legal commitments for the protection of vulnerable species. In the past two weeks, Federal and Provincial wildlife authorities have confirmed that this habitat must be protected—these findings are however being swept aside to fast-track forestry road construction so that the companies can benefit from a temporary subsidy programme that covers 90% of their construction costs. Given the current turmoil in the forestry industry with sales of wood and production way down, it makes no sense to fast track these roads against the recommendations of Federal and Provincial wildlife departments.”*

The path forward

A moratorium on forestry development should be maintained in the targeted sector until the government is able to demonstrate that adequate measures have been put in place to ensure the long-term protection of woodland caribou habitat in the Crees’ territory. Québec must also consider the intact forests of Eeyou Istchee as a priority in reaching its objective of protecting 50% of the northern boreal region of the province. The Grand Council of the Crees and CPAWS – Québec continue to believe that sustainable forestry is necessary and achievable on Cree territory. However, both are resolved to support the targeted moratorium on forestry until they can be assured that the last intact forests of Eeyou Istchee will not be developed recklessly as currently planned.