

## **Review of Assessment for the United Counties of Stormont Dundas Glengarry Forest, Ontario Canada**

The following forms<sup>[1]</sup> are based on the Peer Review procedure from the HCV Resource Network. They have been modified by CMC to fit into a form, but otherwise follow all of the requirements<sup>[2]</sup>. For questions contact Tom Clark (705 645 2580 [tom@tomclark.ca](mailto:tom@tomclark.ca)). Note these forms are accompanied by a covering letter providing summary findings of the review.

Findings in this review are assessed as either major, minor, not applicable (N/A) or as suggestions.

- Major findings mean that a key component of the assessment is missing or incorrectly assessed.
- Minor findings affect the clarity or usefulness of the assessment.
- Suggestions relate mainly to clarity and possible fixes to problems in the report itself or other sources of information.
- Not applicable means that for some reason that section of the peer review did not apply to the report being reviewed.

Each section of the report may have multiple findings that are either major, minor or suggestions. The findings are the opinion of the peer reviewer and are not binding on the Company, however, the findings need to be addressed for the peer review to be considered as evidence in an audit.

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## 1. Executive Summary of the Document

### Objective:

In this section the review evaluates:

- a) Are the key findings clearly presented and summarized?
- b) Does the summary accurately reflect the findings and recommendations of the main document?

### Findings:

For the purposes of the HCV assessment of a property the size of United Counties of Stormont Dundas Glengarry Forest (SDGF properties in the 2007-2026 plan period with a total of 3401 ha), an Executive Summary is not necessary. Technically, Appendix E (page 49, RA Adapted GLSL Standard) would be consistent with an executive summary.

Appendix E is done in a different format than other EOMF properties. For example, some elements of the framework are not listed – probably because there were no HCVs designated. As well, there appears to be duplicate lines in the table. However, there is a good summary of the HCVs with enough information to provide a good overview, including management. A suggestion is made to review the table for duplicate lines and for clarity, possibly including entries for elements with no HCVs designation.

**Issues:** None Minor Major N/A

**Suggestion:** SDGF could review the table for duplicate lines and for clarity, possibly including entries for elements with no HCVs designated.

**Forest Manager Comment:** *The HCV assessment is reviewed and updated annually incorporating new information as it becomes available. The Forest Manager will review the table for duplicate lines and for clarity, include entries for elements with no HCV designation on next review (2019). The SDG Forest adopted the HCV format of the group certificate holder (EOMF) in 2014 and has reported annually following the designated format.*

## 2. Scope of the Assessment

### Objective:

In this section the review evaluates:

- a) Is the assessment area and surrounding landscape clearly defined?
- b) Is there a basic summary of the company and its operations in the area?
- c) Are the impact and scale of proposed operations adequately described?

### Findings:

The SDGF FMP (2007-2026) has an overview of the history and surrounding area. As well it includes the business plan for the forest (not in the version provided for review).

The FMP (App 2) also contains detailed maps/photographs of all parcels in the land base (not provided to the reviewer).

As a municipal government, SDG County activities are available to the public.

Impact and scale are available through the Appendix 2 parcel maps.

**Issues:** None Minor Major N/A

**Suggestion:** None

**Forest Manager Comment:** None

### 3. Wider Landscape Context and Significance of the Assessed Area

#### Objective:

In this section the review evaluates:

- a) The wider landscape is convincingly and adequately described?
- b) Are the key social and biological features of the wider landscape clearly described?

#### Findings:

The FMP provides a description of the area and the role of forest operations in section B-1.0 Forest History -- SDG County Forest History; Physical Features; Topography; Geology; Soil Properties; Climate - in keeping with the size and intensity of the operations.

The participation of SDGF in the Eastern Ontario Model Forest system with other Counties and agencies across southern Ontario provides awareness of the larger landscape.

SDGF consults with the Provincial Government planners, foresters and biologists about forestry issues and landscape considerations.

**Issues:** None Minor Major N/A

**Suggestion:** None

**Forest Manager Comment:** None

### 4. HCV Assessment Process Including Consultation Processes

#### 4.1 Composition and Qualifications of The Assessment Team

##### Objective:

In this section the review evaluates:

- a) Was there adequate access to relevant expertise to assess biological and social values?

##### Findings:

SDGF makes use of Provincial Government expertise. As a small forest, "in house" expertise is limited. Specific requirements for each value is provided in the Provincial guides (called "Stand and Site Guide"). Local MNRF biologists and foresters are available.

As FSC certificate holders, the standard requires SDGF to follow (or exceed) these prescriptions.

**Issues:** None Minor Major N/A

**Suggestion:** None

**Forest Manager Comment:** None

#### 4.2. Data Sources and Data Collection Methodologies

##### Objective:

In this section the review evaluates:

- a) Are data sources and data collection methodologies clearly described or referenced and summarized (and presented in annexes if appropriate), and are they adequate to identify HCVs?
- b) Were reasonable efforts made to fill gaps in the data, proportionate to the impact and scale of the operations?

##### Findings:

The Provincial government maintains an online website with current heritage information on species at risk and some other values. (<https://www.ontario.ca/page/make-natural-heritage-area-map>).

SDGF conducted their own ecological survey of their properties. We note that there was some updating of the FMP to discuss HCVs. Data was appropriate, proportionate to the impact and scale of the operations.

**Issues:** None Minor Major N/A

**Suggestion:** None

**Forest Manager Comment:** None

#### 4.3. Consultation Processes

##### **Objective:**

In this section the review evaluates consultation for identification, management and monitoring:

- a. Were relevant stakeholders appropriately consulted?
- b. Is this documented in a verifiable manner?
- c. Were their views or the information they provided incorporated into the relevant process?

##### **Findings:**

SDGF is a public forest and attracts many users. Managers regularly consult with users. As a high profile publicly owned forest, the opinions of stakeholders are considered and responded to. There was no mention in the documentation of advisory committees. This should be provided to comply with the HCV requirement. As well, documentation is not discussed, such as minutes of advisory meetings, and correspondence, which should be kept for a suitable length of time.

SDG County Forest Management Plan Committee and the EOMF Certification Working Group reviewed the document.

**Issues:** None Minor Major N/A

**Suggestion:** There was no mention in the documentation of advisory committees. This should be provided to comply with the HCV requirement. As well, documentation is not discussed, such as minutes of advisory meetings, and correspondence, which should be kept for a suitable length of time.

##### **Forest Manager Comments:**

*The SDG Forest is a participating member of the SNC Forestry Committee with representation by the County Planner. The SNC Forestry Committee provides the opportunity for the Forest Manager to solicit input from the various stakeholders on issues and values common and unique to both the SNC Forest and SDG Forest. Minutes of the Forestry Committee are published on the SNC website.*

[www.nation.on.ca](http://www.nation.on.ca)

*In addition, all SDG management and operational plans, including the most recent published HCVF reports, require approval of County council. The most recent published document can be reviewed at : [https://www.sdgcounties.ca/sites/default/files/council\\_docs/2017-05-15%20Meeting%20Package.pdf](https://www.sdgcounties.ca/sites/default/files/council_docs/2017-05-15%20Meeting%20Package.pdf) SDG County Council minutes are published on the SDG County website. [www.sdgcounties.ca](http://www.sdgcounties.ca)*

## 5. Identification, Location and Status of Each HCV

### 5.1. Addressing All Six Hcvs

#### Objective:

In this section the review evaluates how the report assesses the individual 19 elements.

#### Findings:

##### Category 1

Element 1: SDGF provided information on their own Species at Risk surveys in App E.

Provincial data is also available through NHIC website which is not specifically mentioned. A minor finding is made to update the list using the NHIC website as the last date of update is not apparent and there are some possible species which may occur in the area which are not mentioned. They should be verified as not present. The provincial list is updated about twice annually, and is the EOMF commitment, which SDGF follows.

In addition to the above, SDGF used the Federal SARA legislation in Appendix E as a basis for determining species status. The appropriate legislation is the Ontario ESA. SARA was in place during the FMP preparation and prior to ESA.

Element 2: This question appears to have been skipped, but likely it was assessed as no HCV. A comment is made above to review that approach.

Element 3: Deer yards are a notable and appropriate designation.

Element 4: Appears to have been skipped.

Element 5: Cottonwood a unique HCV.

Element 6: Appropriately assessed. Most PSWs, could also be designated in 13.

##### Category 2

Element 7: Not relevant to SDG Forest.

##### Category 3

Element 8: Not relevant to SDG Forest.

Element 9: Appropriately assessed

Element 10: Appears to have been skipped.

Element 11: Appropriately assessed

##### Category 4

Element 12: Appropriately assessed

Element 13: Normally PSWs are designated here. As they were designated elsewhere, the effect is the same. A suggestion is made to repeat the designation here.

Element 14: Appropriately assessed

##### Category 5

Element 15: Black Ash designation is appropriate.

##### Category 6

Element 16: Appropriately assessed

Element 17: Appropriately assessed

Issues: None **Minor** Major N/A

A minor finding is made to update the list using the NHIC website as the last date of update is not apparent and there are some possible species which may occur in the area which are not mentioned. In addition, SDGF used the Federal SARA legislation in Appendix E as a basis for determining species status. The appropriate legislation is the Ontario ESA. SARA was in place during the FMP preparation and prior to ESA.

**Suggestion:**

The answers to some questions are skipped but likely it was assessed as no HCV. A comment is made above to review that approach. As mentioned before, some questions are not the same as the accredited FSC standard.

**Forest Manager Comment:**

*The reference to NHIC will be amended in future HCVF reports to include the specific data set and version (date) used in the assessment. As mentioned by the reviewer, SARA legislation was used in preparation of the SDG Forest Management Plan prior to Ontario ESA being passed, operationally the forest is managed in compliance with the ESA. The HCVF report will be amended to reflect the appropriate legislation.*

*For clarity, elements assessed with no HCVs will be appropriately identified.*

**5.2. Data Quality**

In this section the review evaluates:

- a) Whether data is detailed, recent and complete enough to make informed decisions on HCVs.
- b) Is the precautionary principle appropriately invoked in the use of data?

**Findings:**

There are several sources of information, as listed above, local and provincial, which provide good information on values. A broad provincial system (inventory and GIS) for natural heritage information is available to the managers and they avail themselves of it (<https://www.ontario.ca/page/make-natural-heritage-area-map>). It could specifically be referenced in the documentation.

The SDGF is precautionary in forestry activities. They are scrutinized carefully by Council and the public for acceptable practices.

Precautionary principle would be invoked (as required by their FSC certification) but no situations required its application. In Ontario, the level of management across the landscape is at a high level, and local managers remain aware of important values that need special attention. The SDGF managers are in contact with that network.

Issues: **None** Minor Major N/A

**Suggestion:** None

**Forest Manager Comment:** None

**5.3. Reference to HCV Toolkits**

**Objective:**

In this section the review evaluates:

- a) Has a National Interpretation of HCVs been used, or (in the absence of a National Interpretation), have the generic HCVF Toolkit guidelines been appropriately interpreted?

**Findings:**

The framework questions generally follow the Canadian National Framework (FSC Boreal standard Appendix 5). They were modified and earlier in this review a suggestion was made to clarify the list.

Here, we would extend that suggestion to number and clarify the questions so they more closely follow the accredited HCV framework (Boreal standard App 5).

The questions do appear to cover the appropriate subject material and define the HCVs appropriately for a forest of this size. The managers have defined a good and apparently logical list of HCVs, so there is no reason to doubt its appropriateness.

**Issues:** None Minor Major N/A

**Suggestion:**

The manager could review the questions in comparison to the official FSC Boreal standard Appendix 5.

#### **5.4. Decision on HCV Status**

**Objective:**

In this section the review evaluates:

- a) Is the HCV (and its components) clearly defined and described?

**Findings:**

The report clearly lists their HCVs, which are primarily SAR. Some suggestions are made in section 5.1 about the listing of HCVs. We note that the list of questions is edited and somewhat difficult to compare with unedited lists.

Issues: None Minor Major N/A Suggestion

As in the previous section, managers could review the list of framework questions, which is edited and somewhat difficult to compare with unedited lists.

#### **5.5. Mapping Decisions**

**Objective:**

In this section the review evaluates how the report provides maps of HCVs, including the protection of maps for values that are confidential.

- a) Are maps of HCV occurrence clear, accurate and useful?
- b) Are maps of HCV occurrence presented at an adequate level of resolution and sufficient completeness for management decisions?

**Findings:**

Good resolution maps of the parcels are available from the County and are confidential. They were not provided for this review. Given the GIS information available, we accepted that maps are available, and Appendix E has described a reasonable set of HCVs for which mapping is essential. There is no finding here.

Issues: None Minor Major N/A

**Suggestion:** None

**Forest Manager Comment:** None

## **6. Management of HCVs**

### **6.1. Assessment of Threats or Risks to Each HCV Within the Landscape Context**

**Objective:**



In this section the review evaluates how the report assesses threats or risks from current or planned management activities to each HCV within the assessment area identified.

- a) Are threats or risks from current or planned management activities to each HCV within the assessment area identified?
- b) Are threats from external factors to each HCV within the assessment area identified?

**Findings:**

Managers assess threats prior to all forestry activities in the area. This includes being aware of external third-party threats. As the fee simple owners of the properties, they exercise due diligence to protect their property. Operational prescriptions describe the risks to values and avoid them.

**Issues:** None Minor Major N/A

**Suggestion:** None

**Forest Manager Comment:** None

**6.2. Do Proposed Management Plans Adequately Maintain or Enhance HCVs?**

- a) Are management objectives clearly described and appropriate?
- b) Have HCV management areas and management prescriptions been defined for each HCV, wherever those HCVs occur?

**Findings:**

HCV prescriptions are set through guides that are provincial prepared and science based. As long-time certificate holders, the EOMF (umbrella manager) ensures that HCVs are reviewed. Objectives are described in the operational prescriptions for the blocks.

For SAR, the provincial monitoring covers effectiveness. Although the guides do not have regulatory status on private land, the managers have accepted them as the appropriate prescription (through their FSC certification).

**Issues:** None Minor Major N/A

**Suggestion:** None

**Forest Manager Comment:** None

**6.3. Protection of HCVs from land use conversion**

- a) Has each HCV been appropriately identified and mapped, within the wider context, prior to any land use conversion activity (see Section 5)?
- b) Have appropriately scaled maps of HCV management areas been presented, prior to any land use conversion activity?

Note: If it is not possible at the reporting stage to map some HCVs and associated management areas with the precision required, does an adequate process exist to map them prior to commencing any operation?

**Findings:**

The owners hold the property fee simple and can control activity. There have been no significant land conversions.

**Issues:** None Minor Major N/A

**Suggestion:** None

**Forest Manager Comments:** None

## 7. Monitoring of HCVs

### 7.1. Are Monitoring Plans Clearly Described?

**Objective:**

In this section the review evaluates whether methodologies are clearly described and appropriate to meet stated objectives.

**Findings:**

The managers use provincially sanctioned prescriptions (MNRF Stand and Site Guide). The managers monitor these prescriptions as activities occur on or near the HCVs. This is an appropriate level of monitoring for compliance for a forest of this size and intensity.

For SAR, the provincial monitoring covers effectiveness monitoring. The guides need to be shown to be effective. Although the guides do not have regulatory status on private land, the managers have accepted them as the appropriate prescription. As such the guides follow the FSC requirements.

**Issues:** None Minor Major N/A

**Suggestion:** Appendix E could refer to individuals in MNRF with specific knowledge, such as Land Use Planners, Biologists or Foresters.

**Forest Manager Comment:**

### 7.2. Are Monitoring Plans Adequate?

**Objective:**

In this section the review evaluates whether monitoring plan adequately deal with significant changes arising from management operations or likely external threats/risks to HCVs.

**Findings:**

Given the scale and intensity, the managers monitor application of the prescription on site during operations. There were no HCVs which required more frequent monitoring than during the time of forestry activities.

Monitoring for effectiveness of prescriptions occurs at the Provincial level through MNRF.

**Issues:** None Minor Major N/A

**Suggestion:** None

**Forest Manager Comment:** None

### 7.3. Are Plans for A Regular Review of Data Built In To The Management And Monitoring Plan?

**Objective:**

In this section the review evaluates how the report will be updated in future.

**Findings:**

Because of the scale and intensity, the managers rely on Provincial guide sources. Changes to the guides include changes to prescriptions for SAR. The background scientific sources are included in the background information for the MNRF Stand and Site Guide.

**Issues:** None Minor Major N/A

**Suggestion:** None

**Forest Manager Comment:** None

## 8. Responsible management of other conservation values

## 8.1. Conversion of non-HCV ecosystems

Issues: None Minor Major N/A Suggestion

## 8.2. Responsible management of other conservation Values

Issues: None Minor Major N/A Suggestion

Disclaimer:

*"This review was conducted by Tom Clark in good faith on the basis of information provided by Long Point Regional Conservation Authority and the Eastern Ontario Model Forest. I can take no responsibility for the accuracy of information provided and cannot be held liable in any way for any damage or loss resulting from the use or interpretation of this review by the Company or any third party."*

## Acronyms

HCV	High Conservation Value
HCV RN	HCV Resource Network
FMP	Forest Management Plan
FSC	Forest Stewardship Council
SFM	Sustainable Forest Management
DFA	Defined Forest Area
RPF	Registered Professional Forester
COSEWIC	Committee on the Status of Endangered Wildlife in Canada
COSSARO	Committee on the Status of Species at Risk in Ontario
IUCN	International Union For the Conservation of Nature
LLLF	Large Landscape Level Forests (LLLF)

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<sup>[1]</sup> Forms updated February 2015.

<sup>[2]</sup> This review is the sole responsibility of Tom Clark. The use of HCV RN procedures does not imply their participation or oversight.