

# Review of HCV Assessment for the Grey Sauble Conservation Authority, Ontario Canada

The following forms<sup>[1]</sup> are based on the Peer Review procedure from the High Conservation Value 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 in order for the peer review to be considered as evidence in an audit.

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## Part 1

### 1. Executive summary of the document

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 Grey Sauble Conservation Authority (GSCA, properties in the Managed Forest Plan with a total of 11,472 ha) an Executive Summary is not

necessary. Technically, Appendix E (page 49, RA Adapted GLSL Standard) is consistent with an executive summary. This appendix provides some excellent links to the GSCA website including good resolution photo maps, and the FMP and the Forest Management Policy. The website is useful backup for the HCV executive summary. Area summaries are provided.

The introduction has live links to the appropriate sources of information on values.

Issues: None Minor Major N/A Suggestion

## 2. Scope of the assessment

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:

GSCA has a detailed website (<http://www1.greysauble.on.ca/forestry/ca-forest-management>) providing maps and information on the surrounding area, and the communities and ecology, as required by HCV assessment. The boundaries are clearly displayed on the web maps.

As a public agency, the County activities are available to the public. Contracts and operations are available to the public.

Issues: None Minor Major N/A Suggestion

## 3. Wider landscape context and significance of the assessed area

In this section the review evaluates:

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

Findings:

The FMP (2013-2032) has a good discussion of broader landscape. The website provides maps/photographs of all parcels in the GSCA land base (defined forest area) and provides a description of the surrounding landscape. GSCA has a detailed website (<http://www1.greysauble.on.ca/forestry/ca-forest-management>) providing information on the surrounding area, and the communities and ecology, as required by HCV assessment.

The FMP provides a description of the area and the role of forest operations in section 2.2 Physiography, Glacial Landforms, Non-glacial Landforms, Karst Topography; 2.3 SOILS; 2.4 Hydrology; 2.5 Climate

The discussion of Environmentally Sensitive Areas includes Niagara Escarpment, Areas of Natural & Scientific Interest (ANSI's) Wetlands, Old Growth Forests, Forest Interior Habitat, Lake Huron / Georgian Bay Shoreline. These are in keeping with the size and intensity of the operations.

The participation of GSCA in the Eastern Ontario Model Forest system with other Counties and agencies across southern Ontario provides awareness of the larger landscape. GSCA consults with the Provincial Government planners, foresters and biologists about forestry issues and landscape considerations.

Issues: None Minor Major N/A Suggestion

## 4. HCV assessment process including consultation processes

### 4.1 Composition and qualifications of the assessment team

In this section the review evaluates:

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

Findings:

GSCA makes use of the 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”). As FSC certificate holders, the standard requires the manager to follow (or exceed) these prescriptions).

In the HCV discussion in Appendix E, it would be useful to have a link to the source of the scientific background for the prescriptions which are applied. A review of the AOCs in the FMP showed that the actual practices are good, but we could not confirm they align with the current S&S requirements. To address this, the managers could provide their current operational prescriptions, to show that the AOCs are up to date.

Issues: None Minor Major N/A Suggestion

We could not confirm the AOC prescriptions align with the current S&S requirements. To address this, the managers could provide their current operational prescriptions, to show that the AOCs are up to date.

As well a suggestion would be to provide a link to the current S&S Guide at MNRF.

Forest Manager Response: A current link to the OMNR Forest Management Guide for Conserving Biodiversity at the Stand and Site Scales has been added to the HCVF Report.

#### ***4.2. Data sources and data collection methodologies***

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:

GSCA has included detailed Tables of various significant areas in the FMP. These include Niagara Escarpment Areas, Wetlands, COSEWIC SAR, Forest interior, Watercourses. More detailed inventory information was not available for this review.

The use of COSEWIC (Federal) SAR species list is not appropriate because it is different than the COSSARO list which is the official list for the Endangered Species Act. The actual species that are named in Appendix E appear correct. Reference to the HNIC website in Appendix E also means the correct procedure is used for verifying possible SAR on properties.

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>). GSCA also maintain maps in house of locations of key values.

GSCA is committed to conducting their own ecological survey of their properties, and their website provides high resolution links to maps to a number of the forest areas, including recreational uses.

Appendix E provide links to other sources of information about HCVs and values in general such as NHIC website.

Issues: None Minor Major N/A Suggestion

The use of COSEWIC (Federal) SAR species list is not appropriate because it is different than the COSSARO list which is the official list for the Endangered Species Act. The actual species that are named in Appendix E appear correct. Reference to the HNHC website in Appendix E also means the correct procedure is used for verifying possible SAR on properties.

Forest manager Response: The COSSARO list will continue to be used for a source of information for species at risk.

### **4.3. Consultation processes**

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:

GSCA formed a Forestry Advisory Committee (FAC) in 1998. This committee consisted of 24 individuals selected to represent a wide variety of interests, share extensive knowledge and experience of GSCA lands in forest, fisheries and wildlife management. Appendix E could refer to the FAC, as this would be an appropriate location to update the current status of the group. Minutes of meetings could be mentioned.

Also GSCA 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.

Issues: None Minor Major N/A Suggestion

Appendix E could refer to the FAC, along with the location of meeting minutes.

Forest Manager Response: Reference to the Forest Advisory Committee has been added to the HCVF report.

## **5. Identification, location and status of each HCV**

### **5.1. Addressing all six HCVI**

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

Findings:

Cat 1 (A) Element 1: The GSCA FMP Table 11. Summary of COSEWIC Species at Risk in GSCA's Watersheds. Provides a list of SAR. The official list in Ontario is COSSARO. A previous finding is made in this review.

Provincial data is also considered through HNHC website, which is the source for the information in Appendix E. The provincial list is updated about twice annually, and is the regulatory commitment, which EOMF and GSCA follows. The date for the last update to the SAR list should be stated to confirm the list is up to date.

Element 2: This question is correctly assessed. Often this is done incorrectly because the FSC framework question refers to ENDEMIC species. The correct answer is No - there are no species endemic to the region.

Element 3: Appropriately assessed. OK for size and scale.

Element 4: Appropriately assessed. OK for size and scale.

Element 5: Appropriately assessed although not explained. OK for size and scale.

Element 6: Appropriately assessed. Connection to Niagara Escarpment is appropriate.

Cat 2 (B) - Element 7 Note that the list of elements is slightly different than the approved FSC standard. This is not a significant finding, because the only effect is to change the category for some values such as these. This is noted so that auditors will be aware that this review acknowledged the slight difference in the HCV framework that EOMF is using.

Cat 3 (C) - Element 8: Not relevant to this forest.

Element 9: Appropriately assessed. OK for size and scale.

Element 10: Appropriately assessed. OK for size and scale.

Element 11: Appropriately assessed

Cat 4 (D) – Only wetlands assessed as HCV in Cat 4.

Element 12, Element 13, Element 14.

Element 15: Answer for 13 is actually the answer for 14. This should be adjusted because wetlands are important.

Element 16: No answer provided. These forests sustain informal customary use by many people.

Cat 5 (E) Element 17: Appropriately assessed

Cat 6 (F) Element 18: Not assessed

Issues: None Minor Major N/A Suggestion

A minor finding is made to provide the date of the last update of the SAR list NHIC website, as the last date of update is not apparent.

Note that the list of elements (7, 8, 9) is slightly different than the approved FSC standard. This is not a significant finding, because the only effect is to change the category for some values such as these. This is noted so that auditors will be aware that this review acknowledged the slight difference in the HCV framework that EOMF is using.

Forest Manager Response: The link provide to the NHIC is current. SAR lists will be updated based on current NHIC website.

## ***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>).

GSCA is precautionary in forestry activities. They are scrutinized carefully by the public for acceptable practices given the high number of users and the publicity that the forest gets.

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 managers are in contact with that network.

The forest management policy provides a clear direction to managers... "Ensure native species and Species at Risk (SAR) are protected and the spread of invasive species (IS) is controlled. Activities are conducted to: - Identify SAR that live on GSCA lands and protect them and their habitats, - Identify IS on GSC lands, and prioritize actions to control them."

Issues: None Minor Major N/A Suggestion

### ***5.3. Reference to HCV toolkits***

- 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 slightly but the questions cover the appropriate subject material and define the HCVs appropriately for a forest of this size.

Issues: None Minor Major N/A Suggestion

The manager could review the questions in comparison to the accredited FSC Boreal standard (Appendix 5).

Forest Manager Response: The questions have been reviewed and element 14 was added to the HCVF report.

### ***5.4. Decision on HCV status***

- 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.

Issues: None Minor Major N/A Suggestion

As in 5.1

Forest Manager Response: Suggestions in 5.1 have been noted.

### ***5.5. Mapping decisions***

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 provided on the GSCA website. GIS information for each species is available at <https://www.ontario.ca/page/make-natural-heritage-area-map>.

The scale is appropriate.

Issues: None Minor Major N/A Suggestion

## 6. Management of HCVs

### 6.1. *Assessment of threats or risks to each HCV within the landscape context*

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 owners of the properties, they exercise due diligence to protect their property. Operational prescriptions describe the risks to values and avoid them.

The managers opt often for “no management (= no forestry)”. This is often the legal requirement in the Escarpment area. The reviewer realizes active management in public forest can be difficult. Although protection is often the appropriate prescription, but it is not essential for HCVs. HCVs can be managed actively as long as the designated value receives precautionary management. In some cases active management is required. A suggestion is made to include or review HCV prescriptions with this in mind.

Issues: None Minor Major N/A Suggestion

Manager could note in Appendix E that although protection is often the appropriate prescription, it is not essential for HCVs.

Forest Manager Response: The following sentence has been added to the HCVF report, “HCV’s can be managed actively if the designated value receives precautionary management.”

### 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

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

Issues: None Minor Major N/A Suggestion

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 are able to control activity. There have been no significant land conversions.

Issues: None Minor Major N/A Suggestion

## 7. Monitoring of HCVs

### *7.1. Are monitoring plans clearly described?*

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

Findings:

The managers use provincially sanctioned prescriptions (MNRFS 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 monitoring needs to show that the guides are 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

### *7.2. Are monitoring plans adequate?*

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 MNRFS.

Issues: None Minor Major N/A Suggestion

### *7.3. Are plans for a regular review of data built in to the management and monitoring plan*

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 MNRFS Stand and Site Guide.

Issues: None Minor Major N/A Suggestion



## 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 Greg Sauble 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)