



# WILDLANDS LEAGUE

*A chapter of the Canadian Parks and Wilderness Society*

Don Bazeley  
Divisional Forester, Tembec  
Hwy 101 West, P.O. Box 1100  
Timmins, Ontario  
P4N 7H9

Dear Don,

Thank you for the opportunity to comment on the FSC Protected Area Gap Analysis for the Martel Forest.

We support the Gap Analysis undertaken by Tembec and the results with some qualification.

Tembec has done a lot of work on this analysis consistent with both past work and with FSC requirements in general, meeting the overall intent of FSC 6.4. If adopted, the identified candidate protected areas would increase protection by almost 19% on the unit (i.e. the percentage of Crown forest area protected would increase from 12.3% to 14.6%).

The areas identified are large enough to contribute significantly to ecological integrity and in some cases they build on existing protection. In one case the proposed protection would substantially improve connectivity between existing protected areas.

Our support is qualified by the fact that the focus of the analysis was on enduring features and intactness was not considered to the extent that it might have been. There are still some significant areas of intact forest on the Martel Forest. In addition, despite the fact that enduring features are traditionally the core of protected area gap analyses and consistent with FSC requirements, there are other tools that can add value to a protected gap analysis, such as Marxan. Marxan can help identify additional candidate protected areas while minimizing wood supply impacts.

Our recommendation is that Tembec ensure intact forest areas are conserved as HCVs and given more weight in future gap analyses and that additional tools such as Marxan be considered for future use.



# WILDLANDS LEAGUE

*A chapter of the Canadian Parks and Wilderness Society*

Sincerely,

Dave Pearce  
Manager, Forest Conservation  
CPAWS Wildlands League  
401 Richmond St. W. Suite 380  
Toronto ON M5V 3A8  
416 971 9453 ext. 40 phone  
416 979 3155 fax  
416 659 4407 cell  
[dave@wildlandsleague.org](mailto:dave@wildlandsleague.org)