

Gros Morne National Park
P.O. Box 130
Rocky Harbour, NL A0K 4N0

April 16, 2021

RE: Spruce Budworm Public Consultation

Dear Parks Canada Staff;

The Association of Registered Professional Foresters of Newfoundland & Labrador (RPFNL) and the Canadian Institute of Forestry, Newfoundland and Labrador Section (CIFNL) is pleased to provide stakeholder comments regarding Gros Morne National Park's (GMNP) participation in the *Early Intervention Budworm Control Program*.

RPFNL is responsible for registering and regulating professional foresters in the province of Newfoundland and Labrador. Established in 1996, and bound by the Foresters Act (2011), the association is dedicated to the advocacy, promotion and professional practice of forestry in our province.

Established in 1908, the Canadian Institute of Forestry (CIF) is the oldest forest society in Canada. CIF serves as the "voice of forest practitioners" representing foresters, forest technologists and technicians, ecologists, biologists, educators and many others with a professional interest in forestry. Nationally, there are over 2,000 CIF members. The Newfoundland and Labrador Section (CIFNL), established in 1956, includes approximately 100 members.

Forestry is the profession of science, art, and practice of creating, managing, using and conserving forests and associated resources, in a sustainable manner, to meet desired goals, needs and values for human benefit. It is our position that forests are not static but rather a dynamic intergraded system that requires an adaptive management approach.

Please consider the following comments to help with the decision-making process for Parks Canada for the management of spruce budworm within Gros Morne National Park.

1. Forestry is a long-term proposition. The forest of GMNP began to be heavily impacted by insect defoliation in the 1970's. Over the next 40+ years, the natural forest succession and ecology was adversely impacted to the extent that extensive areas of mature forests were killed and did not sufficiently regenerate, creating "Savannah-like" grassland areas.
2. The boreal forest, of which GMNP is part, naturally occurs as even aged forests. It is predisposed to these conditions due to the silvics of its major tree species (i.e. prolific seeders, grow best in full sunlight, and dynamics driven by natural catastrophic events).
3. Balsam fir forest types tend to follow the same successional pathways regardless of disturbance type (e.g. insect outbreak, blowdown or cutting) (Meades & Moores, 1989).

4. To say that insect defoliation is natural and creates gaps where forests regenerate, as stated by Parks Canada, is only partially true. In Newfoundland and Labrador, the experience has been that natural regeneration has been seriously impacted by moose browsing. Given the fact that moose are also an introduced species, regeneration would be highly dependent on successful management of the moose population.
5. The natural succession of predominantly balsam fir forests is mainly insect and wind throw which creates various sized patches of even aged forests. Individual areas could be hundreds of hectares in size.
6. Repeated defoliation of budworm resulting in tree mortality, greatly increases the fire behaviour potential for several years after stand mortality. This is primarily due to dead standing trees with crown breakage, windthrow and the rearrangement of dry fuels. If a fire were to occur in this fuel complex, high fire danger ratings could allow for rapid fire spread rates, and the burning of fine bark, branches and twigs could possibly create spot fires well ahead of the flame front (Stocks, 1987).
7. Terra Nova National Park has had to employ many forest management techniques such as scarification, prescribed burning and planting to regain appropriate forest cover in that park following the 1970's insect outbreak and the subsequent failure of natural forest regeneration.
8. Consulting the *Spruce Budworm Early Intervention Strategy* (EIS) would be instructive for the consideration of Parks Canada and others. This EIS research group, composed of several provinces and other groups, has considerable success over several years in dealing with the outbreak currently moving across Eastern Canada.

EIS info may be useful (website, news articles, reports, emails, twitter, etc.)

On behalf of our members, we thank you for your time.

The Association of Registered Professional Foresters of Newfoundland and Labrador
Canadian Institute of Forestry, Newfoundland and Labrador Section