Mr. Michael Gluck, Manager  
Caribou Conservation Section  
Ministry of Natural Resources  
955 Oliver Road  
Thunder Bay, Ontario  
P7B 5E1  

Dear Mr. Gluck:  

Subject: Mountain Pine Beetle: Another Reason why Jack Pine Forest Restoration for Woodland Caribou is Fundamentally Flawed  

In our previous submissions to you regarding implementation of the caribou conservation plan, the Ontario Federation of Anglers and Hunters (OFAH) has expressed skepticism and concern about current provincial forest management direction toward silvicultural regeneration of more uniform Jack Pine/conifer stands within the continuous caribou zone.  

To date, we have raised objections to this management direction based on several reasonable grounds, including:  

- a long-term reduction in wildlife habitat quality, including reduced Moose carrying capacity, at Wildlife Management Unit (WMU) and landscape levels; 

- an unnecessary and unacceptable loss of public access to Crown resources and recreation (if roads are closed for decommissioning immediately post timber harvest (ostensibly for the purpose of silvicultural pine restoration); 

- MNR’s own bioclimatic modeling of effects of climate change suggests that caribou habitat and range will continue to shrink northward (regardless of efforts to create caribou habitat); 

- the silvicultural method proposed by the MNR would require multiple applications of herbicide to the detriment of habitat quality for a host of game and nongame species, including Moose, Black Bear, Ruffed Grouse, and Spruce Grouse; 

- knowledge that emerging pine forest pests, including the eastward expansion of Mountain Pine Beetle into Ontario’s boreal forest, are poised to undermine efforts to create uniform conifer forest for future caribou habitat; and 

- ecological knowledge that mixed forests are more resilient and adapted to potentially devastating exotic tree pathogens and insects (such as the Mountain Pine Beetle).
In other words, we are convinced that there are more than enough biological, economic and ecological reasons to conclude that Woodland Caribou conservation based on the experimental creation/restoration of uniform Jack Pine/conifer stands for future caribou habitat, at a landscape level, is seriously flawed.

We read in the Globe & Mail (April 24, 2011) that at a recent national forum, provincial experts in forest pests and pathogens have concluded:

"It’s no longer a matter of if, but when the destructive Mountain Pine Beetle will spread east of Alberta through Canada’s northern boreal forest," say provincial forestry experts in Manitoba and Ontario.

Dr. Taylor Scarr, Ontario’s Provincial Forest Entomologist, is quoted:

"The beetle eventually will move eastward into Manitoba and then Ontario...the insect is behaving differently in Alberta...the insect has shown an ability to spread and to tolerate weather and climate in Alberta and probably into Saskatchewan and Ontario."

According to the article, the Mountain Pine Beetle has jumped from lodge pole to Jack Pine, where it is poised to run eastward throughout the boreal forest. The article says Ontario’s own forest modeling predicts that the beetle could be in Ontario’s forest in two to three decades.

Clearly, this latest information underlines the contradiction - and fundamental flaw - of an Ontario forest management direction with the objective of creating, or restoring, large uniform Jack Pine/conifer stands for future caribou habitat. It would appear, increasingly, to be an unattainable objective.

Therefore, the OFAH wishes to reiterate and strengthen previous recommendations we have submitted with the following:

1. focus Woodland Caribou and habitat protection in ‘source’ areas, generally in the more northern strongholds of caribou range (e.g. north of the CNR and in areas with low moose and wolf productivity/densities);

2. clarify in forest management policy that silvicultural regeneration of Jack Pine/uniform conifer in commercial forest areas is not a requirement in forest management planning (but may be considered);

3. where attempts to restore uniform conifer are undertaken for future Woodland Caribou habitat, access roads should remain open for a period of 30-40 years post-harvest so that:
   a. Moose and wolf populations that would otherwise increase from habitat effects of logging can be managed at lower densities through hunters with public access;
   b. access for forest insect and disease monitoring, control and/or salvage will be facilitated;
   c. costs of road decommissioning are deferred for a period of 30-40+ years, while the social, economic and ecological management benefits of having access are realized (prior to the possible use of the area by caribou some 50-60+ years post-harvest); and
d. consistent with an adaptive management approach, the experimental test of the hypothesis (i.e. that large conifer/Jack Pine regeneration areas will be used by self-sustaining Woodland Caribou populations decades from now) can be reasonably modified should forest conditions change due to climate and/or forest pests and pathogens.

Yours in Conservation

Ed Reid
Senior Wildlife Biologist

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ER/MD/jb
Attach.

cc: Honourable Linda Jeffrey, Minister of Natural Resources
Rosalyn Lawrence, Assistant Deputy Minister, MNR
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April 24, 2011

Provinces join ranks to stop eastward march of mountain pine beetle

BY RENATA D'ALIESIO
From Monday's Globe and Mail

Alberta, Saskatchewan, Manitoba and Ontario seek Ottawa's help to implement national forestry pest strategy

It's no longer a matter of if, but when the destructive mountain pine beetle will spread east of Alberta through Canada's northern boreal forest, say provincial forestry experts in Manitoba and Ontario.

These provinces, along with Saskatchewan, are stepping up efforts to reduce the insect's anticipated damage. A recent study confirming that, in Alberta, the beetle has jumped species from lodgepole pine to jack pine trees - the most common type of pine in the boreal forest - has amplified concerns and stirred new calls for the federal government to play a stronger role in implementing a national forestry pest strategy.

Ottawa earmarked nearly $13-million in 2006 to develop a pest plan, but that funding has been spent. Responsibility for the strategy now sits with a working group of the Canadian Council of Forest Ministers.

"Right now, it [the strategy] doesn't have the impetus that it once had," said Taylor Scarr, a forest entomologist with Ontario's Ministry of Natural Resources. "Without that source of funding, it's a struggle to maintain the momentum it once had."

Ontario isn't the only province that's worried. The intention of a national forestry pest strategy is to assess regions at risk for an epidemic, co-ordinate provincial responses, and connect cross-country expertise.

Natural Resources Canada spokesman Paul Duchesne did not directly address provinces' concerns. In an e-mail, he noted that the provincial-federal working group is focused on implementing a national forestry pest strategy. Meetings are expected in the next few weeks to outline progress and to map next steps, he added.

Canada's boreal forest stretches from Yukon to the Atlantic provinces. To date, Alberta has spent nearly $300-million fighting the pest's advancement in that province after the beetles chewed through a large swath of British Columbia's forests.

Provinces had hoped the tree-killing beetle would lose steam in northern Alberta's cold winters, but at a recent forestry forum in the Rockies, a grim consensus emerged.

The beetle eventually will move eastward into Manitoba and then Ontario, said Dr. Scarr, one of the attendees.

In Ontario's case, that could be in two to three decades, according to the province's modelling. For Manitoba, the threat is more acute.
"Manitoba is kind of positioned for a perfect storm. We’ve got the emerald ash borer coming from Ontario ... and we’ve got the mountain pine beetle coming from the West," said Glenn Peterson, manager of forest health with Manitoba Conservation. "If they both get here at the same time, we’re going to be in big trouble."

Forestry is big business in Canada. The economies of nearly 200 communities revolve around the forestry sector. About 230,000 people work directly for the industry, whose exports were valued at $26-billion last year.

In British Columbia, mountain pine beetles have had a devastating effect. Ultimately, the insect is expected to kill one-third of the province’s trees and lead to the loss of as many as 20,000 jobs. Billions of dollars in potential revenue have also evaporated. It’s the kind of economic and environmental damage other provinces are desperate to avoid.

Alberta learned from the B.C. experience. The province has moved much more aggressively to cut down and burn infested trees. The insect is being held at bay in southern Alberta and in Saskatchewan’s southwestern Cypress Hills, where the beetle has been present for about three decades.

The outlook in northern Alberta is less promising. Mountain pine beetles began appearing there a decade ago in small pockets near the border with B.C. In 2006, however, strong winds carried a large swarm farther east, into the Grande Prairie area. They’ve been breeding and spreading eastward ever since.

"The insect is behaving differently in Alberta," Dr. Scarr noted. "The insect has shown an ability to spread and to tolerate the weather and climate in Alberta and probably into Saskatchewan and Ontario."

Officials from Alberta, Saskatchewan and the federal government are slated to discuss the growing beetle threat in Regina on Wednesday. Saskatchewan plans to more than double its forestry pest and disease budget, boosting it to $2.2-million. Manitoba, meanwhile, is drafting a provincial strategy to deal with the insect and increasing highway checks of logs and firewood to ensure they’re not infested.

Saskatchewan Environment Minister Dustin Duncan is one of the voices advocating for a national beetle strategy, though he’s quick to add that he believes the federal government is a willing partner.

"They have played a role in this issue," Mr. Duncan said. "We need to work together to tackle this important and serious threat to not just our forests here in Saskatchewan, but to the forest belt that runs throughout the country."

Alberta has long argued that the mountain pine beetle is a national issue, but its requests for federal funding to combat the infestation have not been successful. (Natural Resources Canada spent about $2.5-million on beetle research last fiscal year.) Mel Knight, the province’s Minister of Sustainable Resource Development, won’t reveal how much money the Alberta government has requested. However, he suggested "a much more robust conversation on funding and strategies is warranted with both Ottawa and neighbouring provinces since the beetle has jumped species and infested jack pine trees.

"Considering the risk and the threat level has now gone up quite a bit," Mr. Knight said, "perhaps it is time to put the spurs to a national strategy with respect to this particular pest."
Voracious mountain pine beetle spreads east

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