

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

P.O. Box 2800, 4601 Guthrie Drive, Peterborough, Ontario K9J 8L5
Phone: (705) 748.6324 • Fax: (705) 748.9577 • Visit: www.ofah.org • Email: ofah@ofah.org

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Mr. Craig Crosson, Forest Management Planning Specialist
Ministry of Natural Resources and Forestry
Policy Division
Crown Forests and Lands Policy Branch
Forest Legislation and Planning Section
70 Foster Drive, Suite 400
Sault Ste. Marie, Ontario
P6A 6V5

Dear Craig:

Subject: EBR Registry Number 012-5973: Proposed Revisions to the Forest Management Planning Manual for Crown Forests in Ontario, Forest Information Manual and Forest Operations and Silviculture Manual

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, subscribers and supporters, and 725 member clubs, we have reviewed the proposed changes to the Forest Management Planning Manual for Crown Forests in Ontario, Forest Information Manual, and Forest Operations and Silviculture Manual. The OFAH is in general support of the changes to the manuals to promote more effective management of Ontario's forests. That said, we have identified concerns related to some of the specific proposed changes.

Background

The OFAH has been actively involved in the consultation and representation of anglers' and hunters' interests in the development of Forest Management Plans (FMP) and the guiding documents that help with the creation of these plans. The changes under Declaration Order MNR-75 allow for a more logical development of a Forest Management Plan on a timescale that allows for the proper observation of the impacts of current practices, which will guide future management decisions. The OFAH promotes the use of science-based land management strategies and appropriate evaluation is necessary to determine the effectiveness of these strategies. The efficient use of government resources and taxpayer dollars is important, but the integrity of the industry and environment cannot be compromised for the sake of cost savings. With these principles guiding our analysis, we submit the following comments on the proposed changes.

Proposed Change #4 – Allowing an entire FMP to be recognized to have the same effect as a permit issued in accordance with the *Endangered Species Act* Section 17(2) will significantly reduce costs while still protecting threatened species. Though these changes may decrease the number of hours spent reviewing section 17(2) applications, there is a risk of oversimplifying mitigation and increasing risks to threatened species if implemented without an appropriate monitoring, auditing, and compliance program in place. There is a risk of encountering wildlife species in areas that were not comprehensively surveyed initially, or due to the natural movement of species on an extended temporal scale, caused by anthropogenic land-use or redistribution resulting from natural disturbance. Therefore, these variabilities need to be monitored by both the FMP holder and the MNRF in a provincially consistent manner. Additionally, the models used to create the harvest plans and wildlife habitat management strategies need to be audited on an appropriate timescale to ensure their applicability and effectiveness.

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Proposed Change #10 – The OFAH is in full support of the addition of the Silviculture Enhancement Initiative to the FMPM documentation. The inclusion of science- and evidence-based ground rules will improve overall performance, while the monitoring of early establishment conditions and benchmarks will not only help determine optimized timber management, but also ensure habitat and wildlife goals are also being achieved.

Proposed Change #20 – The OFAH is in full support of this change in the FMPM. The explanation of when forest management techniques are employed in the FMP will increase transparency and will provide the general public with a better understanding of the strategies used, why they are to be used, and how these strategies will impact their activities. For example, an explanation could include how and when prescribed burning will be used, and how it influences asset protection or improves moose habitat. Another example may be how and when pesticide application is to be used for vegetation control and what effects this will have on the area. Both of these techniques are of significant concern to anglers and hunters, as well as other outdoor recreationists.

Proposed Change #22 – The OFAH is in full support of the change to the FMPM to remove predetermined exact crossing locations through areas of concern in the FMP. Establishing a suite of conditions and construction parameters will allow for the construction techniques to be modified to match the current conditions, as opposed to forcing the licensee to construct as described in previously approved plans. Especially as the previously approved plans may no longer offer the most appropriate direction. The finalization of plans for construction, following the pre-approved suite of conditions, in the Annual Work Schedule can allow for better protection of areas of concern by matching construction techniques to conditions, especially for construction across important waterbodies.

Proposed Change #37 – The OFAH strongly supports the allowance of extensions with added consultation requirements. This allows for the public to be fully aware of what the extensions mean for activities on the landscape, and will allow licensees to more fully utilize the lands they planned to use in their original FMP and contingency plans.

Proposed Change #38 – The establishment of approved water crossing standards can be an effective way to manage the construction of low risk watercourse crossings. To ensure the integrity of the construction and policy of a proponent-driven “construct-to-rule” process for water crossings, a fair and provincially consistent system of auditing and verification needs to be in place. In the current forestry compliance program, effort, targets, and many other factors are determined regionally, and there is no provincially consistent audit program established. Therefore, the current compliance program is not equipped to ensure/enforce a standardized “construct-to-rule” policy. With the development of approved water crossing standards, will there also be a provincially consistent audit program, based on a statistically significant subset of total or new approved water crossings, developed to ensure compliance to the standards? Is there going to be a reporting system in place to track the number of water crossings installed under the new standard?

Proposed Change #43 – The incorporation of the updates to the Wildland Fire Management Strategy to the FMPM is fully supported by the OFAH. The modified fire response potential allows for the incorporation of natural disturbance regimes within a landscape. When incorporated into the FMP, this will allow for determination of areas that can benefit from wildfires and help accomplish regionally-based habitat and wildlife management goals in the most natural way possible, all while protecting only what is absolutely necessary to reduce the extremely high cost of wildfire fighting.

Proposed Change #57 – Again the establishment of standardized “construct-to-rule” conditions, even within individual FMPs, is an effective way to reduce processing hours for low risk non-water area of concern crossings. Like **Proposed Change #38** a provincially consistent audit program needs to be in place to ensure effective compliance monitoring.

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Unmentioned Concern – The OFAH has a concern, which has not been addressed within any of the FMPM proposed changes, and we believe to be a very relevant issue. The OFAH would like to see conditions put into the FMPM to have the FMPs formatted in such a way as to allow the incorporation of the information into the Crown Land Use Policy Atlas (CLUPA). It is common for information on the CLUPA to be contradictory to the permissions, strategies, and practices that are in FMPs, especially related to trail and road accessibility. As the MNRF and other organizations continually refer the public to the CLUPA to learn about opportunities on public lands, it is imperative that all activities that affect public land use are represented accurately on the CLUPA. This would offer a valuable service to the public, while minimizing MNRF staff time needed to address these types of enquiries.

Conclusion

The manuals associated with the *Crown Forest Sustainability Act* have been in need of revision to align with current changes in policy direction, updated sustainable forest practices, and ensure the ability to adapt in the future. The OFAH fully supports updating the Forest Management Planning Manual, Forest Information Manual, and Forest Operations and Silviculture Manual, and thank the MNRF for the opportunity to contribute to this process. We see this as an opportunity to ensure the conservation and rehabilitation of habitat, and as a way to ensure the sustainable development of one of the most important resources in Ontario.

The OFAH wishes to be involved with the development of the FMPM in any way possible. We look forward to receiving feedback on our current contribution, and would welcome any invitation to contribute in the future.

Yours in Conservation,



Robert Cole
Land Use Policy and Habitat Specialist

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cc: OFAH Board of Directors
OFAH Land Use/Access/Trails Advisory Committee
Angelo Lombardo, OFAH Executive Director
Greg Farrant, OFAH Manager, Government Affairs & Policy
Matt DeMille, OFAH Manager, Fish & Wildlife Services
OFAH Fish & Wildlife Staff