

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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E-MAILED
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Ms. Kirsten Corrigan, Manager
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 Ms. Corrigan:

Subject: EBR Registry Number 012-8685: Ontario's Crown Forests: Opportunities to Enhance Carbon Storage? A Discussion Paper

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, subscribers and supporters, and 740 member clubs, we have reviewed the Ontario's Crown Forests: Opportunities to Enhance Carbon Storage? A Discussion Paper (hereafter the Paper). We recognize the importance of managing Greenhouse Gas (GHG) emissions and mitigating the effects of climate change, and how large landscape management of Ontario's Crown forests can, and already do, play a role. The OFAH would like to commend the MNR for their proactive work and initiative to inform and educate all Ontarians of the important role that sustainable forest management plays in carbon sequestration and carbon management.

As key conservation stakeholders, the OFAH is keenly interested in the management of Crown forests and climate change mitigation. Our community, and the activities we engage in, are both directly impacted by forest management and climate change, and also contribute to landscape-level management and climate change mitigation through land/habitat conservation and resource management. Ensuring sustainable forest and habitat management, and mitigating the impacts of climate change on angling, hunting, and trapping is critical for our members and the greater outdoors community.

It is important to dispel the misguided interpretation that "no-use" or old growth forests are the most desirable for long-term carbon sequestration, storage, and ecological sustainability. Yet it is equally important to not be driven by a carbon-first lens, which may influence management decisions towards a forest state that does not optimize other ecological, social, and economic values. Looking at forest management from a carbon-first lens could have significant negative effects on long-term ecological sustainability, as well as have significant negative impacts on social, recreational, cultural, and heritage values.

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Forest management under the Crown Forest Sustainability Act (CFSA) is designed to work with natural forest and ecosystem functions, including fires, to sustainably maintain all aspects of the forest landscape. This encompasses everything from trees and lumber, to water filtration and cycling, to wildlife and Species at Risk habitat, to recreation, and cultural and heritage activities. This balanced approach makes Ontario's Crown forests some of the best managed forests in the world, and is the result of the investment of countless hours and resources by the Government of Ontario, the forest industry, foresters, environmental and conservation organizations (including the OFAH), and the general public. The OFAH is concerned that the additive nature of the proposed carbon offset will be challenging for any industry, activity, or user of Crown forests. Ontario forests in the Area of Undertaking already contribute to carbon sequestration and storage at a high level that could not be easily increased without significant changes in the demand for wood products, long-term forest management planning, and serious consideration for social, ecological, and economic trade-offs. There may be a few areas where moderate modification to practices might increase the carbon sequestration potential of Ontario's forests, but these changes need to complement natural ecosystem functions like fire, soil development, water filtration, biodiversity, and many others.

We support in principle the enhancement of carbon sequestration and mitigation of GHG emissions and climate change. Yet in practice, areas where improvements can be made may be specific and/or limited, need to be carefully considered with all factors of a functioning forest (including social, recreational, and cultural interests), and on an appropriate temporal scale to ensure long-term sustainability. Several of the suggested practices related to carbon management using forests in the Paper have been shown to have negative impacts on forests and overall sustainability in other Canadian and international jurisdictions. For example, salvage and recovery of woody materials for biofuels, depending on the scale, can have severe negative impacts on soil chemical, biological, and mechanical functions, disrupt hydrological cycles, reduce ecological integrity, reduce microhabitat, remove critical soil nutrients, and significantly reduce biodiversity. Therefore, if practiced broadly or in inappropriate areas, this could have negative ecological impacts and may even release more GHG into the atmosphere than are saved by their substitution for fossil fuels.

Additionally, fire suppression as a tool to reduce carbon emissions, as mentioned in the Paper, may not be long-term solution to carbon management. While suppressing fires will reduce the immediate release of carbon dioxide to the environment, there will become a point where fuel loading of a forest will result in high intensity fires that cannot be suppressed, which can scarify the soil. This would impact soil health and nutrient availability, disrupt biological functions, and eliminate seedbanks, which ultimately reduces the ability of the forest to recover. Some of the largest/highest intensity fires observed in Canada and United States can be attributed to fuel loading as a result of sustained fire suppression practices. In natural conditions most fires burn at a low intensity that leave a number of snags, as well as numerous trees that will recover from the fire. Natural fires reduce fuel load closer to the ground, reducing the likelihood of intense crown fires, and stimulate growth of fresh early succession plants (e.g. grasses, shrubs, forbs) that store most of their carbon biomass below the soil surface (long-term carbon storage) and provide forage and habitat. Natural functions, and practices that emulate natural functions, will effectively sequester carbon while maintaining ecological integrity and biodiversity, ensuring the forest ecosystem has the resilience to continue to function and provide a myriad of environmental services.

In general, forest management is driven by market demand. The Ontario government should be promoting the importance of existing forest management to encourage use of sustainable forest products. The current forest management system already provides significant ecological, societal, and GHG sequestration and storage services, but Ontario's sustainable wood supply is often greatly underutilized. Increasing/fully utilizing the supply of sustainable wood in Ontario through increased forest product demand can increase the amount of carbon sequestration and storage through economy of scale without the creation of additive carbon offsets that could reduce the sustainability of the currently managed forests.

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We support programs that encourage increasing the rate/amount of sequestration through planting; however, any programs towards forestation of land (directly related to carbon sequestration or otherwise) should be consistent with natural heritage (i.e. ecological land classification). For example planting Boreal spp. in a historically Laurentian Forest, Laurentian spp. in an Oak Savanna, or Carolinian spp. in a Tall Grass Prairie, all reduce ecological integrity. Each of these natural ecosystems provide many important social and ecological services including climate change mitigation. In other words, let's not plant trees solely for the sake of a carbon credit program attempting to meet climate change mitigation targets at the potential expense of other ecological, social, and culture values.

Ontario has a premier forest management system in place under the CFSA. While there may be opportunities to encourage better practices or increase utilization that will further GHG management and climate change mitigation, these need to be done within the natural disturbance and function emulation that is the cornerstone of sustainable forest management under the CFSA.

The OFAH appreciates the opportunity to review Ontario's Crown Forests: Opportunities to Enhance Carbon Storage? A Discussion Paper and participate in the conversation about the long-term sustainability of forest management and climate change mitigation in Ontario. We look forward to working with the province further on this and any future initiatives.

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
Matt DeMille, OFAH Manager, Fish & Wildlife Services
OFAH Fish & Wildlife Staff