

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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Mr. Joe Maure
Forest Sector Strategy
Ministry of Natural Resources and Forestry
70 Foster Drive, Suite 610
Sault Ste. Marie, Ontario
P6A 6V5

Dear Joe:

Subject: ERO # 019-0880 Ontario's Forest Sector Strategy (Draft).

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest, non-profit, fish and wildlife conservation-based organization, representing 100,000 members, subscribers and supporters, and 725 member clubs. We have reviewed *A Blueprint for Success: Ontario's Forest Sector Strategy DRAFT* and offer the following comments for consideration. While we support the draft strategy, our comments are scoped to the sections that are most relevant to anglers, hunters and trappers.

Ontario's sustainable forest management generates significant benefits for Ontario's economy and the forest sector, but also has broad benefits for wildlife habitat and the outdoor recreation sector. The strategy indicates that current timber harvest is less than 60% of what it was in 2000; this has negative implications for species such as moose, whose habitat is actively created through forestry practices. Forest harvesting is a management tool that can be used to help manage for desired species as needed, when implementing guidelines such as the Cervid Ecological Framework. Due to the influence that forest practices can have on the creation and removal of certain species and habitats, the OFAH wants to ensure that red-rape reduction does not compromise science-based, environmentally sustainable and beneficial forestry practices.

Enhancing Private Land Harvesting

The OFAH is pleased to see the inclusion of private land forestry in the strategy, as we believe Ontario is not fully capitalizing on the opportunity. Many private forest owners would like to be able to sustainably harvest timber on their property for various reasons. For example, property owners who hunt seek to manage their forests to support wildlife habitat. Currently private landowners face barriers in marketing profitable timber. Private landowners often do not have the equipment to personally harvest timber, and there seem to be fewer options for professional harvesters and/or a nearby mill that will accept the timber they are attempting to market. The market-driven nature of forestry can be extremely limiting to small-scale private land forest management.

The OFAH would like to work with the MNRF to develop resources for private landowners to sustainably and effectively manage their forests for wildlife habitat, while also meaningfully contributing to Ontario's forest sector. We believe that this can be accomplished by improving the Managed Forest Tax Incentive Program (MFTIP), modernizing the private landowner resources that MNRF produced in the past, and increasing the use of "off-market" wood products. It is our belief that more private forestry would occur if more guidance and support were available.

Making Strategic Investments in Forest Access Roads

Forest access roads play a critically important role in the forest industry, but also mining, tourism and outdoor recreation. Oftentimes the majority of users are there for recreation and social purposes, including hunting, fishing, trapping, berry picking, bird watching, hiking and camping. These roads are also important for Indigenous communities, emergency response crews (paramedics, fire fighters, etc.) and occasionally provide the only bypasses for Northern communities to travel if there are closures on Provincial highways. For anglers, hunters and trappers, forest access roads connect them to many of their preferred and traditional areas. The construction and maintenance of forest access roads is essential for all users to continue their way of life and for new users to experience the more remote areas of Ontario. Due to the importance of these roads to many Ontarians, consistent funding is essential. The Ontario government funds construction and maintenance costs for main forest access roads and any associated water crossings, in order to ensure they are accessible to all Ontarians to use, through the Forest Roads Funding Program. This program needs to continue into the future to ensure that the access that Ontarians rely on is preserved.

Because these access roads are so important to outdoor recreationists, the OFAH would like to see more consideration given to how and when forest access roads are decommissioned. The OFAH would like to see signs and internet postings used to state the approximate lifespan of any access road that is scheduled to be decommissioned. As soon as the Sustainable Forest Licence holder indicates that they intend to decommission a road, signs should be posted with its proposed closure date. This should be followed up by internet postings closer to the time of decommissioning. This combination of physical signage and internet postings should ensure the majority of users will be able to find out about decommissioning plans. Additionally, roads that have existed for over a decade should be more closely examined before they are decommissioned, as they are likely actively used and removal could severely restrict recreational access.

Realizing Benefits from Forest Inventory Investments

Investments in forest inventory technologies, such as remote sensing technologies, have many potential spin-off benefits. The data obtained from remote sensing of forests can be used to inform other aspects of wildlife management such as assisting with species at risk monitoring, invasive species detections and assessing wildlife habitat composition and configuration. Remote sensing data for wildlife habitat will allow managers to assess how effectively habitat objectives outlined in documents such as the Cervid Ecological Framework are working. For example, this could provide valuable insight into the quality and availability of moose habitat and assess how effectively forestry practices are at creating the habitat that they are intended to. This data, in combination with the various management guidelines, should be used to determine if forest practices are actually creating their intended wildlife benefits.

Removing Policy Barriers to Accessing Wood

The OFAH would like to encourage the MNRF to look into removing policy barriers related to Crown land forests in Southern Ontario in addition to the area of undertaking. There are numerous tracts of land that are held by the Ontario government, such as those held by Infrastructure Ontario, that should be transferred over to MNRF for the purpose of forestry, in addition to allowing other recreation opportunities such as hunting. Additionally, any forests already possessed by MNRF outside the current area of undertaking, including general use Crown land and land set aside in the past for provincial parks, should be assessed in order to allow for forest operations to occur.

Conclusion

The forest industry is an important aspect of wildlife management; therefore, wildlife and their habitat should be considered whenever forest operations are reviewed. There are opportunities in the strategy that will benefit the forest sector, outdoor recreation and wildlife management objectives. Thank you for considering these comments.

Yours in Conservation,



Lauren Tonelli
Resource Management Specialist

LT/jb

cc: OFAH Board of Directors
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