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May 27, 2015

Richard Stromberg  
Manager  
Ministry of Municipal Affairs and Housing  
Ontario Growth Secretariat  
777 Bay Street  
Toronto, Ontario. M5G 2E5

**Attention: Richard Stromberg**

**Subject: Greater Golden Horseshoe Natural Area Review - Ontario Woodlot Association**

Dear Sir;

The mission of the Ontario Woodlot Association (OWA) is to promote the sustainable management of Ontario's private owned forest by providing our members with guidance and advice. OWA is working to ensure that Ontario's privately owned forest will always contribute to the health of our society, the environment and the economy.

### **Role of Forests on the landscape**

Why are forests important? For the Crown forests of Ontario, according to the Forest Management Guide to the Great Lakes St Lawrence Forest Region, the approach to management is to "conserve diverse and productive forests and their associated ecological processes and biological diversity".

Providing more detail, "a healthy ecosystem has an adaptive set of organisms. For example, primary-secondary consumer complexes, such as Bay Breasted Warblers, help control the spread of forest disease by controlling spruce budworm outbreaks. Functional systems, such as a community of soil organisms, provide nutrients to future trees and habitat for amphibians and small mammals through decomposition. Nest webs, such as those that include keystone woodpeckers, help to provide nesting and feeding habitat for a variety of wildlife. The underlying habitat diversity, together with the flow of energy within integrated food webs, plays a critical role in sustaining the integrity of forest ecosystems."

"The purpose is to ensure the long-term health of our forest ecosystems for the benefit of the local and global environments, while enabling present and future generations to meet their material and social needs."

What are other benefits? Forests store carbon in their living trees. They provide wood to the construction industry and are converted to housing and other needs thus storing carbon in that form, and permitting new trees to grow in their stead. The rural based mills that convert trees to forest products provide jobs and prosperity for local economies. For rural residents they provide wood for heating purposes thus supplanting fossil fuels. Thus sustainably managed forests, in addition to their

biological role, also are important to the social and economic health of rural economies and contribute to combating our seemingly inexorable drift to a dangerously warmer planet.

The Crown forests benefit from having many professional forest managers both from the Ontario Ministry of Natural Resources and Forestry (OMNRF) and various forest industries that operate under licence to manage Ontario's Crown forests. They follow best practices as outlined in the Management Guide and as required by the Crown Forest Sustainability Act. Thus the Crown Forests have the tools and resources at hand to achieve the objective of protecting biological diversity and their associated ecological processes.

### **Southern Ontario**

Most forests in southern Ontario are privately owned; some 4 million ha. They are, for the most part, located in the Great Lakes St Lawrence Forest Region. Along the shores of Lake Ontario and Lake Erie there is the "Deciduous Forest Region" containing trees species such as tulip tree and sassafras that are more typical of forests south of the border. This latter area has typically high quality soils for farming, which has resulted in low percentages of forest cover.

In the Golden Horseshoe area forests are under threat due to population driven development pressures. They are discontinuous with much land taken up for farming and communities, large and small. They come under the mandates of individual municipalities rather than the OMNRF. The key decision makers on this (semi) forested landscape are landowners. Accessing professional foresters for help in making sustainable management decisions costs money. And most owners are not foresters; they are farmers or other classes of rural landowners for which the "professional" management of their woodlands is a secondary concern.

But, from the earlier discussion, it is clear that the continued existence of forested land is key to the natural health of the province. The OWA proposes that, in the Golden Horseshoe, forested land be acknowledged as areas which should be regarded as having the highest priority for their retention. And further, that, as possible, further areas of forested land should be added as opportunity permits. In this regard, OWA applauds the program by OMNRF and Forests Ontario in their efforts to make tree planting affordable for landowners.

### **Education and Incentives, or legislation; which way is best?**

The OWA is in the forest owner education business. By means of its website (<http://ont-woodlot-assoc.org>), its quarterly print 28 page newsletter (*S&W Report*) and monthly e-newsletter it disseminates information on a variety of forest management topics to its members and to non-member woodlot owners. In addition each of 20 OWA chapters holds a variety of field events each year that expose forest owners to different sustainable management approaches. The OMNRF is a partner in this educational effort through a grant that helps support the preparation of the above.

The OMNRF also has two main incentive programs. One is the Managed Forest Tax Incentive Program (MFTIP) that permits forest landowners to have a tax reduction on that land provided that they prepare and follow a forest management plan approved by a professional forester. There are now about 17 thousand landowners with MFTIPs; these landowners benefit by having learned and committed to a sustainable approach to forest management on their lands. These lands will most likely continue to play a key conservation role for all citizens of Ontario.

The other OMNRF incentive program is the “50 million tree program” under which, using Trees Ontario as their agent, landowners can get trees planted for about \$.15 per tree; a big saving for them. This puts additional land under forest cover and management thus adding to all the biodiversity, social and economic advantages earlier discussed.

This program, in our view, is a good example of a positive approach to achieving environmental objectives on private land. There is no law requiring landowners to plant trees. There is no penalty for not planting trees. And yet, it is clear from the preceding analysis that there are profound benefits from having additional land in the Golden Horseshoe in forest cover.

For existing privately owned forests the coalition of Eco Spark, Ontario Nature, Earth Roots and Storm Coalition advocate having more stringent tree cutting by-laws, featuring requirements for permits for tree cutting, (expensive) need for enforcement staff, penalties for infringements and so on. Such an approach, as well as being an expensive drain on the public purse, also alienates landowners rather than turning them into enthusiastic conservation champions, in partnership with their local municipality.

Why, when it is clear how important privately owned forests are to society at large, do we persist in assuming the forest owners have to have sole responsibility to manage them sustainably? After all, we collectively seem content to support the OMNRF in managing our Crown Forests.

It would just be logical to provide a supportive approach to encouraging landowners to retain their forested land and to manage it sustainably. This is what the OWA does through its educational programs delivered both through its website and by OWA chapters throughout southern Ontario.

We would propose that this could be augmented by a program of further assistance to landowners to access professional advice of private land forest consultants. This should be cost shared with landowners (as is the OMNRF 50 million tree program). This might be a joint venture of OMNRF and the various Conservation Authorities in the Golden Horseshoe area.

The OWA could be a participant, too, in a landowner recognition program, perhaps similar to the approach taken by Carolinian Canada with its Landowners Leader program (Note: could we do this with a coalition of our OWA chapters in the Golden Horseshoe area?) The OWA is in the sustainable forest education business. An incentive program by a partnership of the OMNRF and Conservation Authorities could feature paid memberships to OWA and two days per year of professional forestry advice, cost-shared between landowners and the sponsoring agencies.

This non-legislative, non-coercive approach would be much better in creating a climate of conservation by landowners. And in any case, where a specific development is being proposed that would eliminate a woodlot there is already legislation enough; through municipal approval processes, environmental assessments, the endangered species act and so on. These high risk situations where a woodlot would permanently disappear already have protection under existing legislation and planning processes. Another overlay of regulation is not needed and could well be counterproductive.

### **Summary of Main Points**

1. Forests in the review area are of paramount biodiversity resources, valuable not only to their owners, but to all people of Ontario.

2. These forests should be given the highest priority for retention on the landscape.
3. The OMNRF incentive programs for planting trees and the Managed Forest Tax Incentive Plan are good examples of encouraging and rewarding landowners to increase the area under forest cover and to manage these forests sustainably.
4. The OWA sustainable forest educational programs, at the provincial level and local chapter level, with support from OMNRF, are ideal ways to help landowners learn about how to be better forest managers.
5. A legislative, punitive approach to force landowners to act is expensive and acts as a disincentive to good management. Instead further incentives and rewards should be the preferred tools to achieve forest conservation objectives in the review area.

On behalf of the OWA, thank you very much for your time on this matter.

Should you have any questions please feel free to contact me.

Sincerely

A handwritten signature in blue ink, appearing to read "Eric Thompson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Eric Thompson, RPF.  
Executive Director  
Ontario Woodlot Association