



May 26th, 2021

Ontario Woodlot Association and Eastern Ontario Model Forest Response to the Environmental Registry Bulletin – 2019-2020 Annual Report to the Minister of the Environment, Conservation and Parks from the Committee on the Status of Species at Risk in Ontario.

The Ontario Woodlot Association (OWA) and the Eastern Ontario Model Forest (EOMF) represent over 3,000 members in Ontario, promoting good forest stewardship, best management practices and ecological, social, and economic sustainability to these members, and far beyond. We have a long history of supporting both the health and productivity of Ontario's privately owned forests. The maintenance of ecosystem processes, wildlife habitat supply, and the conservation of biodiversity are key areas of interest and focus for our members.

Within this context, the OWA-EOMF are responding to the Committee on the Status of Species at Risk in Ontario (COSSARO) 2019-2020 annual report that includes the assessment and classification of Black Ash (*Fraxinus nigra*) as Endangered. As Black Ash is widely distributed in Ontario, including in the woodlots and wetlands of many of our members, the OWA-EOMF wish to offer input into the development of a protection and recovery approach for this important tree species.

As stated in the COSSARO assessment, the invasive species—Emerald Ash Borer (EAB) is the primary cause of concern due to anticipated mortality of Black Ash across much of its natural range. Listing Black Ash as endangered, however, will not slow the spread of EAB and is in fact contradictory to the recommended practices for mitigating the impacts of EAB and building ecosystem resilience. Over the course of several years the Ontario Ministry of Natural Resources and Forestry (OMNRF) and partners (including OWA-EOMF) developed silvicultural and forest management approaches to respond to EAB, which are referred to in the provincial Forest Management Guide to Silviculture in the Great Lakes-St. Lawrence and Boreal Forests of Ontario. A key concept is that, in advance of significant spread and mortality of Ash from EAB, Ash stands could be managed to promote regeneration and diversity of other species, i.e., targeted removal (not elimination) of Ash trees, and subsequent recruitment of alternate species like Cedar, Yellow Birch, Bur Oak, Silver and Red Maple, etc. to avoid EAB-induced loss of forest canopy cover.

Listing Black Ash as endangered will directly contradict scientifically based best management practices for managing Ash forests. If these forests are allowed to succumb to EAB-induced mortality without this proper management, the resulting drastic reduction in forest canopy will lead to forest and treed wetland loss through changes in water tables, flooding, and the proliferation of invasive species. Subsequently many of these dying forests will become targets for permanent forest loss through conversion to agriculture. This listing will also result in the creation of tens of thousands of hectares of unsafe forests dominated by dead hazard trees in both public and private lands, and in the closure of numerous public trails.

Black Ash logs are economically important to Indigenous communities and as firewood throughout rural Ontario. Listing Black Ash as endangered serves no species preservation purpose as it will not prevent the destruction of Ash forests by EAB and will discourage landowners from protecting individual trees with the insecticide Treeazin. Our main objective should be to conserve lowland hardwood forests which include a healthy component of Black Ash. Selection thinning of Ash-dominated forests is used to reduce (not eliminate) the Ash component and favour the growth of other native tree species like Maple, Birch, Oak, and Hickory. By lightly thinning the forests, small canopy gaps are created which favour the regeneration of native species including Ash, sustaining the forest for future generations. Again, as part of this process, firewood is cut, and high value Black Ash logs are identified which can be used by First Nations for cultural purposes.

Increasing the diversity of ages or cohorts of Black Ash with these recommended silvicultural practices will add resiliency to forest stands, through the recruitment of younger individuals. This can contribute to long-term resilience while new biological controls and other mitigative techniques are being researched and developed for the control of EAB. These strategies are based on considerable consultation and review and are still valid for forests that are not yet affected by EAB, or that will not be for potentially many years. One of our major projects involves the establishment of the Huronia and Fleetwood Community Forest Owners Cooperatives, where we are also assisting with existing and future EAB impacts as required. This includes helping landowners with species identification, seed collection, and in creating generally healthier and more resilient woodlots and wetlands.

The removal and salvage or disposal of infested trees (i.e., sanitation) is also an important consideration to contain the spread of EAB. Impacts of EAB are being mitigated through early detection and removal of initially affected trees that host and subsequently amplify the EAB population. Black Ash is ubiquitous in Ontario and is unavoidable in the construction and maintenance of safe roadways. As an aggressive colonizer of moist or wet sites, Black Ash is often encountered in the development and maintenance of roads, water crossings, power corridors and other critical infrastructure. Mechanisms are, therefore, needed to enable the maintenance and development of safe, critical infrastructure where Ash trees are likely to proliferate. The salvage of dead or dying trees also provides economic opportunities in addition to slowing the spread of EAB.

Proper forest management provides successful approaches to sustaining and recovering species at risk, irrespective of the threats from invasive species and/or climate change. Woodlot owners and forest managers need to rely on the tools and expertise that are currently available and under development to respond and adapt to a changing environment. As such, the protection and recovery strategy for Black Ash needs to provide for an appropriate range of actions, not a simple prohibition on cutting.

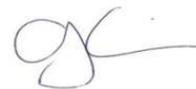
The document *Preparing for Emerald Ash Borer—A Landowner's Guide to Managing Ash Forests* is particularly relevant with respect to what we have presented in this letter and may be accessed on the EOMF website at: <https://www.eomf.on.ca/media/k2/attachments/Preparing-for-EAB.pdf>

Please do not hesitate to contact us for additional information or more constructive ideas.

Yours truly,



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cc. John Yakabuski, Minister of Natural Resources and Forestry