



**ONTARIO
RIVERS
ALLIANCE**

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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, ON
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By Email: Kirsten.Corrigan@Ontario.ca

Re: EBR Registry Number: 012-8685
Ontario's Crown Forests: Opportunities to Enhance Carbon Storage?

Dear Ms. Corrigan:

Ontario Rivers Alliance (ORA) is a Not-for-Profit grassroots organization acting as a voice for several stewardships, organizations, and private and First Nation citizens who have come together to protect, conserve and restore healthy river ecosystems.

ORA is very pleased to provide our views on the policy approaches that the Ministry of Natural Resources and Forestry (MNR) has presented in its Discussion Paper that explores ideas and opportunities to manage Crown forests in a way that contributes to the government's objective of fighting climate change while contributing to the social, economic and environmental needs of current and future generations.

ORA would like to caution the MNR that any consideration of mitigation measures to manage forest ecosystems, and maximize storage or minimize GHG emissions, must take a holistic watershed approach that considers the impacts that harvesting could have on Ontario riverine ecosystems.

Stream-side forests are crucial to the protection and enhancement of freshwater resources. They are extremely complex ecosystems that provide useful ecosystem services such as mitigating or controlling non-point-source pollution as well as providing optimum food and habitat for stream communities. As a component of an integrated management system including nutrient management and sediment and erosion control practices, stream-side forests have important effects on water quality. They remove excess nutrients, pollutants and sediments from surface runoff and shallow groundwater and they also shade streams to optimize light and



temperature conditions and provide dissolved and particulate organic food for aquatic plants and animals.¹

It is important to have a broader perspective that not only focuses on carbon storage and emissions, but also takes into account the practice of leaving some trees to die and decay naturally in the forest to anchor and build up the soil, and provide habitat.

Sustainable forestry methods must include low impact logging practices, selective harvesting with natural generation in mind, and avoid logging techniques that remove all the high-value trees or all the largest trees from a forest. Clear-cutting increases the chances of losing productive topsoil to wind and water erosion, and can have a negative impact on local streams, rivers and lakes within the watershed.

The ORA supports Ontario's Crown forests being managed in a way that helps to reduce Greenhouse Gas (GHG) emissions; however, our preferred approach is a government-led **Forest Carbon Management** approach, where the optimum amount of carbon stored in forests and wood products is achieved through sustainable forest management practices. Additionally, any policy encouraging measures to minimize emissions from forests must also provide measures to selectively and carefully harvest a portion of those trees that can no longer store carbon.

ORA recommends a greater emphasis on policy designed to strengthen sustainable forest management practices that protect our freshwater resources, species at risk, fish and wildlife habitat, encourages biodiversity and lastly, maximizes carbon storage. Carbon storage in Crown forests should not come at the expense of other valued ecosystem benefits.

The government should introduce policy and legislation that requires the forestry industry to follow sustainable forest management practices that protect the environment and old-growth forests, encourages biodiversity, and mandates sustainable carbon storage practices.

Forest Carbon Offset Projects are not the preferred option because of the possibility of increasing the costs of goods and products.

Thank you for this opportunity to comment!

Respectfully,

Linda Heron
Chair, Ontario Rivers Alliance

¹ United States Department of Agriculture, Forest Service, Methods to Conserve and Enhance the Production of Clean Water from Forests