



January 26, 2009

Mike Briennesse  
Forester  
Forest Policy Section, Forest Management Branch  
Ministry of Natural Resources  
Suite 400, 70 Foster Street  
Sault Ste. Marie, Ontario  
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**RE: Forest Management Guide for Conserving Biodiversity at the Stand and Site Scales (EBR #010-5218)**

Dear Mr. Briennesse,

Thank you for the opportunity to comment on the Environmental Bill of Rights Registry posting of the draft Forest Management Guide for Conserving Biodiversity at the Stand and Site Scales (EBR #010-5218), and to remain apprised of proposed changes to forest management practices in Ontario.

Conservation Authorities play a significant role in forest management for the province, with a mandate to protect, manage and restore Ontario's woodlands, wetlands and natural habitat. Conservation Authorities have a long history of partnering with the Ministry of Natural Resources (MNR) to carry out this mandate. Conservation Ontario, on behalf of Ontario's 36 Conservation Authorities, wants to commend MNR for undertaking this initiative to reflect the most recent scientific knowledge on conserving biodiversity during forest management operations conducted at the stand and site scales, and to streamline forest management guidance in Ontario.

Please consider the following comments, which are based upon a review by Credit Valley Conservation and Conservation Ontario staff, when finalizing the draft Guide.

In general, the standards, guidelines and best management practices found within the Guide are detailed and comprehensive. It is noted that the Guide addresses landscape, stand and site protection, as well as protection of habitat and special features.

The lack of guidance regarding the protection of hydrologic function found within the Guide raises concerns. Specifically, Sections 4.1.1 (Lakes and Ponds), 4.1.2 (Rivers and Streams) and 4.1.3 (Wetlands) do not address protection of underground hydrological

linkages such as those between high groundwater recharge areas and the aquatic resources that are being protected. Protection of groundwater recharge areas is limited to known brook trout spawning areas (Section 4.2.1). This is counter to an ecosystems or functional approach in which groundwater recharge should be ensured to maintain or enhance the existing hydrological regime of aquatic resources for the benefit of all species.

It is noted that MNR has committed to the application of the ecosystem approach for managing natural resources, as per its Statement of Environmental Values. It is recommended that this principle should be pervasive throughout all of the Ministry's best management practices and guidance documents; the direction specified within the Forest Management Guide for Conserving Biodiversity at the Stand and Site Scales should reflect the ecosystem approach.

Additionally, Section 5.0 (Operational Considerations) should stress that forestry activities near water and wetlands must be in compliance with the *Fisheries Act* and the *Conservation Authorities Act*. When working in or around wetlands, water, or valleys, planning teams must know which laws and permit requirements apply to their situation. Permits and/or timing restrictions may apply.

It is noted that Section 5.1.2 (Water Crossings) does state that "Further information about the approval process for road and water crossings (e.g. MNR engineering approvals) can be obtained from the local MNR and/or Conservation Authority." However, this guidance also applies to, but is missing from, other subsections of Section 5.0 (e.g. Section 5.1.1 Part B (Roads within Areas of Concern)). Therefore, we suggest that the beginning of Section 5.0 strongly recommend that planning teams contact the local Conservation Authority (where they exist) to receive advice and/or permits prior to commencing any work in or around water and wetlands.

Once again, thank you for the opportunity to provide comments on the proposed Forest Management Guide for Conserving Biodiversity at the Stand and Site Scales. If you have any questions regarding the above comments please contact myself at (905) 895-0716 ext. 223 or Natasha Leahy at ext. 228.

Sincerely,



Bonnie Fox  
Policy and Planning Specialist

c.c. Environmental Commissioner of Ontario  
All Conservation Authorities General Managers/CAOs  
Jo-Anne Rzdki, Watershed Stewardship Coordinator, Conservation Ontario