Canadian Institute of Forestry
Institut forestier du Canada

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Kirsten Corrigal
Manager, Species at Risk Recovery Section
Species at Risk Branch
Ministry of the Environment, Conservation and Parks
Government of Ontario
40 St Clair Avenue West, Floor 14
Toronto, ON M4V 1M2

Re: 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

Dear Kirsten,

The Canadian Institute of Forestry / Institut forestier du Canada (CIF-IFC) represents over 1200 members across Canada, acting as the national voice of forest practitioners and promoting public awareness and understanding of good forest stewardship and sustainability. Accordingly, our members have a vested interest in supporting the health and productivity of Canada's forests. The associated conservation of biodiversity and species at risk in response to invasive species and climate change is a particularly important subject. It is with this in mind that the CIF-IFC is 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, and much of Canada, the CIF-IFC is interested in providing input into the development of a protection and recovery approach for this species.

As stated in the COSSARO assessment, the invasive emerald ash borer (EAB) is the primary cause for 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 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 and partners developed silvicultural approaches to respond to EAB, which is 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 should be managed to promote regeneration and diversity of other species, i.e., removal through targeted harvest (not eradication) of ash trees and subsequent recruitment of alternate species like cedar, yellow birch, bur oak, silver/red maple, etc. to avoid EAB-induced loss of forest canopy cover.

Increasing the diversity of ages or cohorts of Black Ash with recommended silvicultural approaches will also add resiliency to EAB with the recruitment of younger individuals. This can contribute to long-term resilience while biological controls and other mitigative techniques are being researched and developed. These strategies are based on considerable consultation and review and are still valid for forests that are not yet affected by

EAB, or that won't be for potentially many years. If these ash forests are allowed to succumb to EAB without proper management, the resulting loss in forest canopy can lead to forest and treed wetland loss, potential changes in water tables, flooding, and the proliferation of invasive species.

The removal and salvage or disposal of infested trees (i.e., sanitation) is also a key consideration to contain the spread of EAB. Impacts of EAB are being mitigated though early detection and removal of initially-affected trees that host and subsequently amplify the EAB population. A prohibition on cutting will likely hasten the decline of Black Ash forests and healthy ecosystems by precluding treatments that are designed to slow the EAB spread.

Black Ash is ubiquitous in Ontario and is often encountered and is unavoidable in the construction and maintenance of safe roadways, water crossings, power corridors and other critical infrastructure. This is not surprising as Black Ash is an aggressive colonizer of moist or wet sites. 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. Black Ash is a commercially important species and also provides culturally important wood products for Indigenous communities, and sanitation thinning and salvage can contribute to the use of this traditional resource.

The protection and recovery strategy for Black Ash needs to provide for an appropriate range of actions not simply a prohibition on cutting. Indeed, older stands of ash are likely more vulnerable to EAB. We believe that proper forest management provides successful approaches to sustaining and recovering species at risk, especially under the threats from invasive species and/or climate change. Forest managers need to rely on the tools and expertise that are currently available and under development to respond and adapt to changing threats.

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

Yours truly,

Mark Pearson
Executive Director / Directeur général
Canadian Institute of Forestry / Institut forestier du Canada (CIF-IFC)

p.p. CIF-IFC Forest Advocacy Committee