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Public Input Coordinator
Species at Risk Branch
Ministry of Environment, Conservation and Parks

November 5, 2021

Online submission via the <https://ero.ontario.ca/notice/019-4278>

Subject: ERO Posting #019-4278: Minister's Order for temporary suspension of protection upon the listing of Black Ash under the *Endangered Species Act*

Dear Public Input Coordinator,

Greenmantle Forest Inc. (GFI) is the Sustainable Forest Licencee for the Lakehead Forest. As such, Environmental Registry of Ontario (ERO) Posting #019-4278 and its outcome is important to GFI's forest operations.

We thank you for the opportunity to comment on the Ministry of the Environment, Conservation and Parks' (MECP) important proposal – a Minister's Order for temporary suspension of protection upon Black Ash under the *Endangered Species Act*, ERO #019-4278. Black Ash and its habitat are broadly distributed across the Lakehead Forest, often in association with lowland stands with other hardwoods in small, scattered amounts. Black Ash is represented in the forest resource inventory and classified within the 'Other Hardwood' forest unit for forest management planning purposes. Harvest of Black Ash on the Lakehead Forest is generally 'incidental', often occurring within road right-of-ways. It is marketed as commercial fuelwood and for hardwood lumber.

We are writing to you today to express strong support for this proposal and encourage MECP to move forward with the two-year temporary suspension in listing black ash as endangered. We believe this pause is necessary to provide MECP time to work with the Ministry of Northern Development, Mines, Natural Resources and Forestry (MNDMNR) and the forest sector to examine and address issues affecting the forest sector broadly and GFI specifically, should Black Ash be listed as a Species at Risk (SAR).

At this time we believe the following items need to be addressed:

1. The inability to sell Black Ash harvested in accordance with the Crown Forest Sustainability Act (CFS) and Endangered Species Act (ESA).
2. Development of a clear definition of Black Ash habitat, as the species occurs widely across Ontario in association with other lowland hardwoods and mixedwoods.

3. Development of Area of Concern prescriptions to protect regulated Black Ash habitat.
4. Continued research into methods to control the spread of the Emerald Ash Borer, the source of the decline of the species.

The proposed two-year temporary suspension of protection of Black Ash is a vital decision that will allow all those affected by the listing, including the forest industry and the MNDMNRF, time to develop appropriate and comprehensive management actions. It is imperative that MECP use this time to plan for the future of Black Ash in Ontario - beyond simply listing the species as endangered.

While GFI recognizes the valuable information in the report prepared by the Committee on the Status of Species at Risk in Ontario, we strongly feel a two-year temporary suspension relative to a 100-year model projection is not an unreasonable action.

Sincerely,

Greenmantle Forest Inc.

Per: Judy Hall, RPF

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