Troy Anthony

Ministry of Natural Resources and Forestry

70 Foster Drive

Sault Ste. Marie, Ontario

P6A 6V5

January 14, 2020

**RE**: Support for ERO# 019-1020 Proposed Changes to the Crown Forest Sustainability Act, 1994

Dear Mr. Anthony,

As a manager with a Sustainable Forest License located in central Ontario, I thank you for the opportunity to comment on the proposed Changes to the CFSA, ER of Ontario number 019-1020. I am writing to express complete support for this proposal. I was an active participant on a CFSA/ESA harmonization project committee a few years ago so participated in many discussions that, in the end, consistently pointed to the solution that this proposal is suggesting.

There will no doubt be strong opposition from some individuals and groups that hold the Endangered Species Act up as the pinnacle in protecting species at risk. However, perhaps they do not appreciate the protection and long term ecosystem health for all species provided for through the CFSA.

The CFSA provides for more than adequate landscape, stand and site-level direction for managing, conserving and protecting species at risk. There is no need for the two acts that are not only redundant in many ways, but also conflict with each other. It has also unfortunately pitted two pieces of Ontario legislation against each other and gives the one piece, the ESA, higher weighting and authority than the other act, the CFSA. The CFSA is the much better legislative mechanism for ensuring long term conservation of all species at risk and non-species at risk. It can avoid the many pitfalls of the individual species by individual species approach that the ESA follows as that approach is not conducive to management over very large areas.

The next, or concurrent step, is to revisit and improve MNRF policy for species at risk, (e.g. Forest Management Guide for Conserving Biodiversity at the Stand and Site Scales). Much of this current direction is unnecessarily restrictive and sometimes counter-productive to forest management goals and objectives to note only provide for a healthy social and economic forest environment but also very much a healthy ecological forest environment as well.

It is hoped that the MNRF policy can be looked at in light of recognizing that in the vast majority of cases forest management represents an extremely minor threat to species at risk such as turtles and snakes which has demonstrated to be the case locally through many decades of collective experience of those working in the forest. The bigger threats to these species lie outside forestry. Improved policy needs to balance the threats from forestry with logistical, affordable forest management direction that also adequately considers impacts of that direction on healthy economies at a local, regional and provincial level.

Thank you again for the opportunity to comment on this proposal to change the CFSA and I once again offer my full support to this initiative.

Sincerely,

Barry Davidson R.P.F.

Forest Manager

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