

# ONTARIO FEDERATION OF ANGLERS & HUNTERS



*Ontario Conservation Centre*

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To Whom It May Concern:

SUBJECT: OFAH Comments on the *Supplemental Report to the Draft Environmental Evaluation Report: Proposed Settlement Lands*

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, supporters, and subscribers, and 725 member clubs, thank you for providing us with an opportunity to comment on the *Supplemental Report to the Draft Environmental Evaluation Report: Proposed Settlement Lands*. We offer the following general comments for consideration. In addition, please see the attached list of parcel-specific questions.

## **General Comments**

The OFAH has been directly involved in the Algonquin Land Claim for several years. During this time, some of our concerns about the land claim have been addressed or alleviated. However, to date, neither the federal nor provincial government has addressed our question relating to overlapping land claims. How does the government intend to address overlapping land and harvesting claims in the Algonquin Land Claim Settlement Area? Has the government contacted other Indigenous communities to discuss their interest on proposed settlement lands? The impacts on non-Indigenous Crown land and resource users in the Settlement Area become confounded when other potential (concurrent or future) claims are made.

We appreciate the parcel maps that were provided by the MNRF. However, we are disappointed that highly detailed Descriptive Plans were not available for review as they had been during previous public consultation periods. The 2020 map package contains much less detail than the map packages provided in 2012 and 2015, making it very difficult to provide fulsome feedback on the impact of the proposed land transfer. Furthermore, there are several parcels of land that are listed as "Other Algonquin Interest" but they do not appear in the Supplemental Report and no maps for these parcels were provided. Some of these parcels include roads, trails, transmission corridors, and numerous waterbodies. In the absence of this information, it is impossible to assess the full impact of the proposed land transfer package and provide informed input.

## **Waterbodies**

The draft EER states that certain non-navigable waterbodies will be transferred to the AOO. What test will be used to determine if a waterbody is navigable? To date, we have not received a response to this question.

The government plans to transfer the beds of eighty-six (86) lakes to the AOO, and yet the anticipated environmental impact is considered to be a "low negative effect." How can the government justify this statement, given that these 86 lakes currently permit public use? What data exists to support this conclusion (e.g. existing use for recreation, level of fishing activity, etc.)? What information does the MNRF have in terms of angler use and rod hours spent on these waterbodies? What is the MNRF doing to balance these losses in a fair and equitable way?

Ontario's broad-scale monitoring (BsM) program is an important component of our provincial fisheries management system. Were any of these 86 waterbodies Trend Lakes under the BsM program? Waterbodies that are not Trend Lakes could be randomly selected as a State Lake. How will the transfer of these waterbodies affect monitoring, assessment, and the data that would have been collected and used to evaluate fisheries at the FMZ level?

Are there any waterbodies that will remain public (i.e., beds not transferred), but that are losing their only existing public access points as a result of the transfer of land, roads, trails, or boat launches? If so, please provide us with a list of affected waterbodies/parcels. For example, the bed of Harrington Lake in parcel 47A is not being transferred to the AOO, but almost the entire shoreline will become privately owned. Will there still be public access to Harrington Lake in parcel 47A or will all of the existing public access points be on private land? Will the public still be able to access Jacks Lakes in parcel 600?

### **Stocked Lakes**

The OFAH is a vocal proponent of sound, science-based fisheries management. We believe fish stocking is a valuable management tool for ensuring sustainable fisheries. Fish stocking is also a wise investment – each dollar spent on the raising and stocking of fish stimulates several additional dollars of economic activity. Our support for stocking programs is evident in all aspects of our involvement in fisheries management – from administering the Community Hatchery Program to support for club-based and provincial fish hatcheries. However, the OFAH firmly opposes publicly-funded stocking of lakes that are not accessible to the general public. Our opposition applies equally to lakes that are exclusive to tourist operators and their guests, private landowners, or Indigenous communities. The draft EER lists 23 that are currently stocked that will be transferred in their entirety to Algonquins of Ontario (AOO) ownership (up from 16 lakes). We cannot support the use of public funds for continued stocking in these lakes unless no-cost public access to these lakes and their resources is guaranteed.

Out of these twenty-three lakes, were any being stocked for rehabilitative/restoration purposes? If so, how many and which lakes? If viable, naturally reproducing populations have established (or establish in the future), the benefits would have come from public tax dollars, but the public likely won't have access to these fisheries to fully appreciate these benefits.

### **Public Roads**

The draft EER states that public roads were selected for transfer only if other access routes are available to the public. Is there any concern about concentrating existing users in fewer access points as a result of transferring public roads? Consider a hypothetical lake that currently boasts five public access points, four of which are transferred to private ownership. Has the government analyzed the potential social and environmental impacts (e.g. user density, road mortality impact on species at risk, parking availability, etc.) of funneling all lake users into a single access point? Are any lakes losing their only existing public access point? If so, please provide us with a list of impacted lakes and their parcels.

### **Trails**

Multiple trails are listed in the Report as being “for discussion.” How can the public remain involved in these discussions after this consultation closes?

### **Protected Areas**

The OFAH is encouraged to see the inclusion of hunting in the consultation process for the proposed expansion of Lake St. Peter Provincial Park and the new Whiteduck Provincial Park. There are a number of existing hunt camps and tourist operations that cater to hunters in the area of the proposed Whiteduck Provincial Park. We would vocally oppose any attempt to restrict or eliminate existing hunting opportunities in these areas.

The Municipality of North Frontenac maintains 76 campsites and 2 public boat launches on Crotch Lake, which provides valuable access to recreational opportunities to the public and revenue to the municipality. Will the establishment of the protected area impact this business?

The OFAH wishes to be involved in other important discussions related to the land claim that are out of scope for the current consultation. Specifically, we look forward to being directly involved in the development of fisheries management plans and wildlife harvesting agreements in the future.

Thank you for giving us an opportunity to comment on the report. We look forward to continued discussions prior to the Final EER.

Yours in Conservation,



Mark Ryckman  
Manager of Policy

MR/jb  
Attach.

cc: OFAH Board of Directors  
OFAH Indigenous Relations Liaison Committee  
Angelo Lombardo, OFAH Executive Director  
Matt DeMille, OFAH Manager, Fish & Wildlife Services  
OFAH Fish and Wildlife Staff

**Parcel-specific Questions**

22Ee: Hamilton Bay Trail is being proposed for transfer, but how will the public continue to access the surrounding Crown land? It appears to be the only access in that area.

22Ge: As above, the transfer of this road appears to result in exclusive AOO access to Crown land even though the land remains public. Is there an access point to Baptiste Lake at the end of this road (Hamilton Bay Trail)?

22I: The interactive map and the Descriptive Plan appear to differ - will use of the Outlook Loop be impacted?

38: The interactive map and the Descriptive Plan appear to differ. There are multiple branch roads or trails south of Hwy 17 – will they be transferred to the AOO or remain public?

47G: Table 5 of the Supplemental Report only lists the “Unnamed Lake” as being proposed for transfer, but the Descriptive Plan suggests that the beds of Tremblay and Sparks Lakes will also be transferred. Is this accurate? If so, they need to be listed in the appropriate Table. Furthermore, Sparks Lake is currently stocked with brook trout.

60O: Will the public still be able to access Jacks Lakes?

66B: This parcel appears on the Descriptive Plan for other parcels, but is not listed in the Supplemental Report and does not have its own plan. What is the “Other Algonquin Interest” in this parcel?

83F1/83F2: These parcels are listed as being adjacent to Mattawa River Provincial Park, but they both appear to overlap park land. What impacts will there be to the boundary of the park?

91G: See general comments about the transfer of stocked lakes.

106A: The transfer of this parcel will result in Pike Lake and Buck Lake being surrounded by private land. Will there still be public access to these lakes?

126F: Will the road crossing this parcel also be transferred to the AOO?

126M: Will the road crossing this parcel also be transferred to the AOO?

129R: The transfer of this parcel will result in McNulty Lake being completely surrounded by private land, but the bed of the lake is not proposed for transfer. Will there still be public access to the lake?

152: The transfer of this parcel will result in Buck Lake and Brewster Lake being completely surrounded by private land, but the beds are not proposed for transfer. Will there still be public access to these lakes?

162: multiple roads and trails are not listed in the Table? Are they being transferred or not?

177/177E: The trails in these parcels are up for discussion. How does the public maintain their involvement in this discussion?

225A: This parcel has been reduced considerably but will access to Fortune Lake be maintained?

226: It appears that Arcol Road is not proposed for transfer but will the transfer of land north of Arcol Road eliminate public access to Arcol Lake?

239: What is the “Other Algonquin Interest” in this parcel? Will the transmission corridor and the bed of Portage Lake be transferred? This parcel is not listed in the Supplemental Report and we were not provided with a Descriptive Plan.

254: Will the trail/road remain open to public or will public access to Heart Lake be lost?

295: Will there continue to be public access to Valiant Lake? This lake is currently stocked with Lake Trout but the bed of the lake is not being transferred.

310: Is Basin Depot Road being transferred? The 2012 plan says it is excluded but the 2020 map is unclear.

317: Several waterbodies are proposed for transfer (1 stocked), but will the roads also be transferred?

362/362A: Is there any remaining public access to Windigo Lake?