

# ONTARIO FEDERATION OF ANGLERS & HUNTERS



*Ontario Conservation Centre*

P.O. Box 2800, 4601 Guthrie Drive, Peterborough, Ontario K9J 8L5  
Phone: (705) 748.6324 • Fax: (705) 748.9577 • Visit: [www.ofah.org](http://www.ofah.org) • Email: [ofah@ofah.org](mailto:ofah@ofah.org)

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Ontario Information Centre  
31 Riverside Drive  
Pembroke, Ontario  
K8A 8R6

Dear Sir or Madam:

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, supporters and subscribers, and 740 member clubs, thank you for providing us with an opportunity to comment on the Algonquin Land Claim Draft Environmental Evaluation Report (EER). We would also like to thank you for meeting with us directly to discuss the concerns of OFAH members. Please consider the following comments in addition to the comments that we provided in our previous discussions.

## **General Comments**

The draft EER represents an important milestone in the treaty-making process. It is the best and most valuable opportunity for the public and legal interest holders to demonstrate the impact that these land transfers will have on their personal or commercial interests. Without input from the broader community, there would be no way of knowing the true impact of land transfers. Our single greatest concern about the draft EER is the short window for public comment. The government has given the public 50 days to voice their concerns on the draft EER (a document that is 262 pages in length and evaluates the environmental impact of the transfer of 217 parcels of land on the broader public). In our opinion, a 50-day comment period is woefully inadequate for a proposal of this magnitude and detail.

The draft EER states, in several places, that “no further consultation is required” on certain topics. We strongly recommend that the Ministry of Natural Resources and Forestry (MNR) continue to communicate with and solicit feedback from the public as it works towards a final EER.

Despite the assertion that the social impacts (e.g. access, recreational use, etc.) of the proposed land transfers have been considered in the development of the draft EER, it is our position that the social impacts have been largely ignored. These social impacts are the most significant concern for many non-Algonquin people who live and recreate within the land claim area, and are likely to continue well after the settlement lands have been transferred. Broader social considerations like general public access are not captured by the current evaluation framework because it focuses on the individual or aggregate concerns of legal interest holders; however, it has been well established that the loss of 117,500 acres of Crown lands will fundamentally change accessibility and recreational use in the land claim area for thousands of people without “legal interest” in the settlement lands. Therefore, social considerations deserve greater recognition and assessment in the draft EER to determine where further consultation or mitigation considerations are necessary.

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The OFAH has been intimately 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 have addressed our question relating to overlapping land claims. How will the government handle overlapping land and harvesting claims in the Algonquin Land Claim Settlement Area (e.g. the Williams Treaty signatories)? 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.

### **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 completely opposes publicly-funded stocking of lakes that are not accessible by 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 16 lakes that are currently stocked that will be transferred in their entirety to Algonquins of Ontario (AOO) ownership. 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.

### **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 funnelling all lake users into a single access point?

### **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 water body is navigable?

The government plans to transfer the beds of 74 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 74 lakes currently permit public use? What data exists to support this conclusion (e.g. existing use for recreation, fishing, etc.)?

### **Additional Consultation Required**

In our opinion, additional public consultation is required on the following issues:

- Access to private property (cottages, etc.);
- Trapping and trap cabins (to ensure the continued provision of benefits from the renewable furbearer resource);
- Bait Harvest Areas;
- Bear Management Areas (to maintain tourist outfitter businesses);
- General recreational activities (as a result of potential restrictions on access and/or the use of motorized vehicles); and
- Hunt/recreation camps issued through Land Use Permits.

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The OFAH wishes to be involved in other important discussions related to the land claim that are out of scope for the current EER 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 draft EER. We look forward to continued discussions prior to the final EER.

Yours in Conservation,



Mark Ryckman

Senior Wildlife Biologist

MR/gh

cc: OFAH Board of Directors  
Angelo Lombardo, OFAH Executive Director  
Greg Farrant, OFAH Manager, Government Affairs & Policy  
Matt DeMille, OFAH Manager, Fish & Wildlife Services  
OFAH Fish & Wildlife Staff