



Eagle Lake Farabout Peninsula Coalition

www.savefarabout.org

C/o Darlene Salter

Co-chair of Eagle Lake Farabout Peninsula Coalition

Site 102 Box 19 RR 4

Dryden, ON P8N 0A2

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VIA email

Standing Committee on Finance and Economic Affairs

99 Wellesley Street West

Room 1405, Whitney Block

Queen's Park Toronto, ON M7A 1A2

Attn: Amarjot Sandhu, MPP, Chair: amarjot.sandhu@pc.ola.org

Attn: Julia Douglas, Clerk: comm-financeaffairs@ola.org

CC: Hon. Rod Phillips, Minister of Finance: rod.phillipsco@pc.ola.org

Hon. Doug Ford, Premier of Ontario: doug.fordco@pc.ola.org

Re: Bill 229, Protect, Support and Recover from COVID-19 Act (Budget Measures), 2020

On behalf of the Eagle Lake Farabout Peninsula Coalition, please find for the assistance of the Standing Committee our recommendation, as discussed below, that: Schedule 6 (proposed changes to the Conservation Authorities Act and consequential amendments) and Schedule 8 (proposed changes to the Crown Forest Sustainability Act, 1994) both be withdrawn in their entirety from Bill 229.

About Eagle Lake Farabout Peninsula Coalition

Eagle Lake Farabout Peninsula Coalition is a non-profit group established in 2008 for the purpose of protecting the 1084- hectare wilderness peninsula, which is situated on the north shore of the famous Eagle Lake, 30 kilometers west of Dryden in Northwestern Ontario. Eagle Lake First Nation representatives, residents, tourist lodge operators, the commercial fishery, recreational users and local naturalists formed a coalition to gain permanent protection for Farabout Peninsula following a 2008 Dryden Forest Management Plan attempt to access the roadless peninsula with a forestry road for the purpose of harvesting trees on the Crown forest. Since 2008, significant natural heritage values have been observed, recorded and added to the Farabout Peninsula life science inventory, which has been submitted to the Ministry of Natural Resources and Forestry. Between 2018 and 2019, significant archaeological sites have been identified on the isthmus and registered under the Ontario Heritage Act and given formal Borden numbers. Ancient artefacts belonging to the Archaic people (2000 to 7000 years ago) and many artefacts belonging to the Laurel Complex (1000 to 2000 years ago) were unearthed. The narrow isthmus is the only access to the peninsula. A forestry access road would ruin the archaeological sites and destroy the nest sites of at least 2 pairs of Canada Warblers. Canada Warblers are on the Ontario and Canadian Species at Risk list.

Lack of Meaningful Public Consultations

I am a member of the Dryden District Ministry of Natural Resources and Forestry Advisory Committee (LCAC). As stated in the Crown Forest Sustainability Act, “The Minister shall establish local citizen committees to advise the Minister on the preparation and implementation of forest management plans and on any other matters referred to the committees by the Minister. 1994, c.25, s.13

Our committee was given no opportunity to make comments on the 2020 Draft Forestry Strategy, which proposes to double the harvest of Crown forest. In the Dryden District, I and many others are alarmed about the current depletion of mature forest across the landscape. To maintain the unsustainable tree harvest on Crown forest in the Dryden District, younger forests with diameters too small for lumber are being chipped to produce pulp, resulting in a huge loss of boreal forest wildlife habitat. Local MNRF foresters were not involved in the 2020 Draft Forestry Strategy. Doubling the tree harvest in the Dryden District would go against the Crown Forest Sustainability Act, 1994.

The 2020 Forest Management Planning Manual was presented to our committee during the October teleconference meeting. We were told the new manual was prepared without MNRF professional input. Our LCAC learned that there will be less opportunity for public input during the development of future Forest Management Plans.

The Ontario government has eliminated the Environmental Commissioner position at EBR. This is another attempt to reduce public comment concerning wildlife management, hunting limits, logging and mining on Crown land and water.

On November 5, 2020, the Ontario Government tabled omnibus budget measures Bill 229 for First Reading in the Ontario Legislature. Schedule 6 of Bill 229 proposes drastic changes to the Conservation Authorities Act and to the conservation authorities in land use planning. Provincially significant wetlands

could lose protection. Schedule 8 of Bill 229 proposes a permanent exemption for authorized logging operations from prohibitions against harming species at risk and destroying their habitats. Again the Ontario government didn't seek input from the public, local citizen advisory committees or Ministry of Natural Resources and Forestry.

All of the above legislation, points to a disturbing anti-environment and undemocratic trend led by the Ontario government.

At the same time our federal Liberal government has goals for a greener economy and the 30% protection of land and water natural areas by 2030. Instead of moving forward as partners with our federal government, Ontario wants to go backwards with less protection for Ontario wetlands and forests.

Remove Schedule 6, proposed changes to the Conservative Authorities Act and consequential amendments

As Co-chair of the Eagle Lake Farabout Peninsula Coalition, I am requesting that Schedule 6 be withdrawn in its entirety from Bill 229. If Schedule 6 goes ahead, then the protection for provincially significant wetlands in Ontario will be eliminated to allow development and natural resource extraction. Wetlands provide habitat for many native species including species at risk. Wetlands retain water and prevent flooding in times of excessive precipitation. Wetlands provide recreation. Conserving wetlands result in more climate resilient communities.

Only one wetland complex in the Dryden area has been designated as a provincially significant wetland. The Nabish wetland drains into Rice Bay on east side of Eagle Lake. There are certainly other significant wetlands in the Dryden area but provincial funds are needed to finance professional biologists to conduct the surveys and submit the reports. So far the provincially significant wetland designation has protected

the documented species at risk in the Nabish wetland complex from having its habitat drained for the sake of a forestry road. The forest industry wanted to drain the cattail marsh but was prohibited from doing so due to the species at risk and the provincially significant wetland designation. The designation also protects a large treed buffer surrounding the wetland. Schedule 6 if passed will allow the forest company to drain parts of the Nabish Wetland for the sake of forestry roads and clear cut all the forest bordering the large wetland complex.

Farabout Peninsula has a great diversity of wetlands including marshy bays, Black Spruce and Tamarack bogs, Black Ash swamps, White Cedar lined streams and beaver ponds. Schedule 6 if passed could endanger our goal to protect the significant wetlands on Farabout Peninsula.

Remove Schedule 8, proposed changes to the Crown Forest Sustainability Act, 1994

As Co-chair of the Eagle Lake Farabout Peninsula Coalition, I oppose the entirety of Schedule 8 and call for the withdrawal of Schedule 8 from Bill 229.

The Crown Forest Sustainability Act, 1994 (CFSA) applies to approximately two-thirds of Ontario's land base, which is home to many species at risk and their habitat. If Schedule 8 is passed, most likely the species at risk populations will decline, some to the point of no return.

Farabout Peninsula on Eagle Lake is part of the Dryden Forest SFL. Only 4.4 % of the Dryden Forest SFL is protected from logging and mining. That is not even close to the 17% protection the UN and our Canadian government wanted to achieve by 2020. All of the Dryden Forest SFL is Crown forest. Crown forest is not a private corporation forest or a tree farm. The CFSA determination of sustainability will be a conclusion that the FMP provides for the long-term Crown forest health on the management unit, and has regard for plant life, animal life, water, soil, air, and social and economic values, including recreational values and heritage values.

Schedule 8 will exempt all forestry operations from protecting species at risk and their habitats necessary for their survival. The forestry companies will also not be responsible for the recovery of species at risk.

Farabout Peninsula has several species at risk. An active Bald Eagle nest on the Farabout isthmus protected Farabout Peninsula from logging in the Dryden Forest 2011-2021 FMP. The treed buffer required for an active Bald Eagle nest prevented the construction of a forestry access road. If Schedule 8 is passed, industrial forestry operations can double the tree harvest in Ontario without being blocked by species at risk. The slogan is, "Ontario is open for business." The red tape is being cut at the expense of Ontario natural heritage values and biodiversity. Ontario is going backwards with living beyond our means instead of moving forward to a healthy, sustainable economy for future generations. It is the same old greed, which impoverishes the future.

Our planet is facing both a biodiversity and climate crisis. Schedule 6 and Schedule 8, if not removed from Bill 229, will greatly contribute to the looming extinction of many native species and the climate crisis.

Regards,

Darlene Salter

Co-chair of Eagle Lake Farabout Peninsula Coalition

dsalter@tbaytel.net