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Ministry of Natural Resources
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Species at Risk Branch
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Michelle.c.Collins@Ontario.ca

Dear Ms. Collins:

**Re: American Eel Recovery Strategy – EBR 012-0405
Government Response Statement**

Ontario Rivers Alliance (ORA) is a Not-for-Profit grassroots organization acting as a voice for the French River Delta Association, CPAWS-OV, Council of Canadians, Kiishik Community Association, Food & Water First, Whitewater Ontario, Vermilion River Stewardship, Mississippi Riverwatchers, French River Stewardship, as well as many other stewardships, associations, and private and First Nations citizens who have come together to protect, conserve and restore healthy river ecosystems all across Ontario.

ORA is writing in response to a request by the Ministry of Natural Resources (MNR) for public input into the Government Response Statement (GRS) to the American Eel Recovery Strategy, which is consistent with the requirements of Section 11 of the Endangered Species Act, 2007.

American Eels were once abundant in the upper St. Lawrence River, Ottawa River, Lake Ontario, and their tributaries, and in fact were so plentiful that they were an invaluable source of sustenance to First Nation communities and early European settlers, and more recently supported thriving commercial and sports fisheries. This all changed with the advent of a multitude of hydroelectric dams constructed within the historic range of the species.

Key to the American Eel's survival and recovery is its ability to migrate to its spawning area in the Sargasso Sea, near Bermuda. This is a perilous journey that only a very small percentage ever complete due to the cumulative effects of the numerous hydroelectric facilities that have killed, maimed, and cut off migration to their spawning area. Consequently their once thriving populations have been reduced to a mere one percent of their original numbers.

ORA strongly supports all of the protection, management and recovery goals and recommendations as set out in the American Eel Recovery Strategy with specific emphasis on the following:

1. To re-establish the species in a wide variety of waters throughout its historical range in Ontario by the year 2150, at abundance levels that:
 - a. Restore cultural relationships and natural heritage values;
 - b. Are consistent with ecosystems of high integrity and function;
 - c. Strengthen the biodiversity of the province's watersheds; and
 - d. Provide valued ecological services.
2. ORA recommends that the GRS:
 - a. Ensures the persistence of the species at existing locations;
 - b. Ensures the natural expansion of the species to historic locations; and
 - c. Achieves natural increases in population levels to avoid introduction of parasites or disease from other areas into Ontario eel populations.
3. A coordinated and strategic watershed based approach to eel recovery and management in their historical range must be a priority.
4. A Steering Committee is formed to oversee a cooperative collaboration between communities, stakeholders, First Nations and government agencies to ensure that protection, management and recovery strategies incorporate science, local community knowledge, and Aboriginal Traditional Knowledge (ATK), and that the goals and recommendations contained in the American Eel Recovery Strategy are carried out in an effective and timely fashion.
5. Ensure existing hydroelectric facilities low in the watershed provide both upstream and downstream fish Passage, with particular priority on the St. Lawrence, Ottawa and Trent Rivers and their tributaries, and at any other facility on the mainstem of their watersheds.
6. Ensure all new hydroelectric facilities on watersheds within the native range of eels are designed to allow for safe upstream and downstream passage, migratory corridors are protected from further permanent blockages, and ensure that eels are protected from harmful alterations or disruptions during peak migration periods.
7. Work in cooperation with all water control boards to identify water management strategies that meet any needs for flood control while not detrimentally affecting eels or their habitat.
8. Eel friendly turbines and/or other eel protection strategies are made mandatory to reduce/eliminate turbine mortality at hydro-electric facilities on all watersheds within the historic range of the American Eel in Ontario.
9. Policy and procedure tools are provided to evaluate and address the cumulative impacts of the numerous water control structures on eel survival and recovery.
10. Locate and quantify areas of residual eel abundance, and then identify and institute habitat parameters associated with eel survival and recovery.

11. Include all components of habitat recommendations to provide the necessary measures for restoration and protection of the American Eel. Protecting eel habitat is critical to the recovery of the species.
12. Provide a Cybercartographic Atlas to support the implementation of the recovery strategy and to enhance integration of western science, local community knowledge and ATK.

ORA supports immediate protection and recovery actions in the upper St. Lawrence River, Ottawa River, Lake Ontario and their tributaries. This would provide the diversity of habitat necessary to ensure a strong recovery of the species, and encourage a broad distribution of benefits that will instill resilience to a species that has collapsed to near extinction in Ontario. As the American Eel is a keystone in some freshwater fish communities, successful implementation measures would have positive impacts on the ecological health of impacted fisheries, conservation of biodiversity, and recreational opportunities.

Due to the precarious nature of the remaining populations of the American Eel, ORA is requesting that the GRS lay down an ambitious and aggressive plan for implementing all recommendations as set out in the American Eel Recovery Strategy.

Dam operators must be held accountable to society to make their industry as clean and green as they tout it to be and therefore must make a supportive contribution by way of full cooperation and financial assistance to carry out the recommendations of the Strategy.

The substantive list of authors to this Strategy reflects a broad base of knowledge and expertise that is beyond question, therefore their recommendations must be fully reflected in the final GRS.

Congratulations to the American Eel Recovery Team for their thorough and comprehensive Report, and for their important contribution to the protection and recovery of the American Eel.

ORA fully support the submissions made by the Algonquins of Ontario, Ottawa Riverkeeper, and Lake Ontario Waterkeeper on this EBR posting.

Thank you for this opportunity to comment.

Respectfully,



Linda Heron
Chair, Ontario Rivers Alliance