

December 13, 2013

Michelle Collins
Ministry of Natural Resources
300 Water Street, Second floor
Robinson Place South Tower
Peterborough, Ontario K9J 8M5

Dear Ms. Collins:

Re: EBR Registry 012-0405 American Eel Recovery Strategy

The Ottawa Valley Chapter of the Canadian Parks and Wilderness Society (CPAWS-OV) works to protect wildlands and wildlife primarily in eastern Ontario and western Quebec. We have a particular interest in species at risk and their habitat.

We are extremely concerned with the plight of the American Eel which once ranged throughout the Ottawa River and St. Lawrence River watersheds in Ontario. Many decades of mismanagement and neglect, including the constructions of dams without fish or eel passageways, overfishing and urban and industrial pollution, has resulted in the near extirpation of the species from the province. It is urgent that these problems be addressed and that the species be given a chance to recover.

CPAWS-OV wishes to thank the authors of the American Eel Recovery Strategy for the effort that has gone into producing this comprehensive plan. We support the general thrust of the document which aims to address many of the threats to the continued survival of the American Eel in Ontario.

In particular we support the proposals:

- (a) to work at a watershed level.
- (b) to address cumulative effects.
- (c) to address upstream and downstream passage around the many dams on rivers that host or once hosted eels (however note our concerns about apparently contradictory statements concerning downstream passage).
- (d) to place a particular emphasis on problems associated with hydro dams which are currently the most pressing issue.
- (e) to identify, protect and restore access to habitat across the historical range of the species.
- (f) conduct various studies to better understand the current status and threats to the species and its habitat.
- (g) to prescribe “all reaches ... currently of formerly occupied, or used as habitat in the habitat regulation for the American Eel”.
- (h) to include in the prescribed area “all rivers, streams and rivulets both permanent and ephemeral”.

However, we have concerns about the following aspects of the strategy and apparent contradictions.

(1) Timelines: The proposed timelines, where given, for implementing the strategy are too long in many cases. We recommend that they be shortened.

The Executive Summary (p. iv) states that “*much progress can be made within one eel generation time*” (20 years). This is a laudable goal. However, we have not found a discussion of this timeline in the document itself. Instead the focus appears to be mainly on much longer timelines associated with more complete recovery (e.g. 2050, 2070, 2150). We recommend that the expected progress after one eel generation be detailed in the document, and used as a tool to evaluate the effectiveness of the Strategy.

The overall target to “*restore resilience*” [p. 5] and for recovery in a “*wide variety of waters throughout [the American Eel’s] historical range*” [p. 52] is 2150. Yet elsewhere (p. 54) it is stated that “*Recovery strategies for species that have experienced serious decline requires strong, quick and effective action*”. We submit that “*quick*” does not apply to a strategy that will take 137 years to unfold!

Construction of upstream and downstream passageways around all of the large hydro facilities in the lower reaches of the major waterways is identified as a critical need in the document. We recommend a timeline to complete this work be set, and suggest 10 years.

On p. 53, it is proposed that out-migration from Ontario be increased to early 1980’s levels by 2070. Early 1980’s levels were probably very low compared to pre-settlement levels. Hopefully, it will not take 57 years to undo the damage that has occurred in the past 30 years – especially if an effective Recovery Strategy is put in place – and to attain the low rates of the early 1980’s. We recommend a shorter target of 2050.

(2) Proposed new hydro dams: Despite the fact that the Strategy clearly identifies hydro-electric facilities as “*by far ... the most immediate, serious and biggest threat to the continued survival and recovery of eels*” (p. 72), the Strategy fails to call for a ban on any more hydro dams within the range of the American Eel (current or historic). It does not make sense to continue to build more hydro dams and expect eel populations to recover. We recommend a ban on new hydro projects in the current and historic range of the American Eel, until the population has recovered.

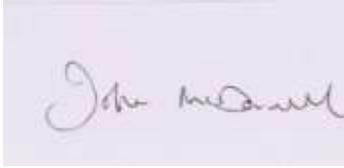
(3) Downstream strategy

The Strategy on p. 56 identifies the short term need for improvements in upstream passage for eels in Ontario, and then goes on to state: “*Because naturally recruited Ontario eels spend one to two decades growing and maturing in fresh water, there will be time to evaluate and implement measures for downstream passage options once upstream passage has been enabled.*” This seems to suggest that work on downstream passage in Ontario can be put off for one or two decades. However, the executive summary (p. v) suggests that a delay is relevant to areas where eels have been extirpated: “*Improvements to downstream passage should be made within 10 years of restoring access to areas where it was formerly prevented.*” And numerous other statements in the document stress the importance of restoring downstream passage at hydro facilities (e.g., p. 33 and 47).

The confusing sentence on p. 56 needs to be clarified to ensure that it only applies to areas where eels have been extirpated, and that downstream passage is an immediate concern where eels still exist, even at very low numbers.

In closing, we welcome this opportunity provide input into this important process and we remain available should you have any questions regarding our comments.

Sincerely,

A rectangular box containing a handwritten signature in cursive script that reads "John McDonnell".

John McDonnell
Executive Director