

# ONTARIO FEDERATION OF ANGLERS & HUNTERS



*Ontario Conservation Centre*

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OFAH FILE: 346/794  
January 14, 2020

Stacey Vojtek  
Crown Forests and Lands Policy Branch  
Crown Lands Section  
Ministry of Natural Resources and Forestry  
300 Water Street  
Peterborough, Ontario  
K9J 3C7

Dear Stacey:

Subject: ERO # 019-1060 Proposal to amend Ontario Regulation 454/96 (Construction) to provide alternative regulatory approval requirements for repairs to existing low hazard wetland dams.

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest, non-profit, fish and wildlife conservation-based organization, representing 100,000 members, subscribers and supporters, and 725 member clubs. We have reviewed the proposal to amend Ontario Regulation 454/96 (Construction) to provide alternative regulatory approval requirements for repairs to existing low hazard wetland dams and offer the following comments for consideration.

Overall the OFAH is supportive of the proposal to streamline approvals for alterations, improvements and repairs on low hazard wetland dams. The definition of low hazard includes minimal loss to fish and wildlife habitat, minimal property loss, no loss of life, and reversible damage to cultural sites. Additionally, this classification would have to be determined by a licensed engineering practitioner and not be changed by the requested dam alterations. These are reasonable requirements to ensure that the proposed alterations, improvements and repairs do not need to go through the full approval process that they currently do under the Lakes and Rivers Improvement Act. However, we would like to ensure that dams classified as "low hazard" are reviewed (by a licensed engineering practitioner) prior to each new alternation, improvement or repair; this way any changes to the landscape around the dam will be captured in the approval process.

The six-year pilot project that the government completed is a responsible way to test the outcomes of this plan before proposing it on the Environmental Registry. This allows for the government to fully test any and all issues that may arise to allow for a smooth transition if this change does get passed. Did the pilot project demonstrate that by streamlining this approval process that more time was freed-up for other types of dam related approvals? If so, the OFAH suggests that the MNRF prioritize the removal of obsolete dams in the time created through the streamlining process. Obsolete dams, in our opinion, are dams which no longer serve their original purpose and provide no significant societal or ecological value (e.g. recreation, improved navigation, lamprey control, etc.). We would like to remind the government that numerous obsolete dams exist across the province that should be removed with the costs shared between the owner and the province.

Thank you for considering these comments.

Yours in Conservation,



Lauren Tonelli  
Resource Management Specialist

LT/jb

cc: OFAH Board of Directors  
Angelo Lombardo, OFAH Executive Director  
Matt DeMille, OFAH Manager, Fish and Wildlife Services  
Mark Ryckman, OFAH Manager, Policy  
OFAH Fish and Wildlife Staff