



Fisheries  
and Oceans

Pêches  
et Océans

Secteur de l'Ontario et des Grands Lacs

Your file *Votre référence*

Ontario – Great Lakes Area

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Our file *Notre référence*

October 30, 2007

Ken East  
Project Manager and Senior Advisor  
Panel on the Future of the Trent Severn Waterway  
185 King Street, Unit 100  
Peterborough, Ontario K9J 2R8

Dear Mr. East:

**Subject:** Follow-up to October 10, 2007 meeting with the Panel on the Future of the Trent-Severn Waterway.

Thank you for meeting with representatives from Fisheries and Oceans Canada to provide input into the TSW Panel Review process.

The mandate of the Fish Habitat Management Program (FHMP) is to protect and conserve fish habitat in support of Canada's coastal and inland fisheries resources. The goals and objectives for the management of fish habitat are described in the DFO Policy for the Management of Fish habitat (1986). The policy sets out a framework for a consistent administration of the habitat management program. Net Gain of productive capacity and No net loss are key elements supporting conservation and management of fish habitat.

Topics of Specific Interest to Fisheries and Oceans Canada as discussed in the meeting:

- Fisheries and Oceans greatly supports the need to examine the management of water levels and flows in a broader context to balance the needs of all stakeholders.
- Should the panel determine that TSW does not have jurisdiction over the beds of the Trent Severn Waterway and as such will not be exercising a permitting right for in-water works, this action has a potentially significant impact to DFO and its ability to deliver the habitat management program. The largest resulting impact would be a greater workload to available staff. DFO would hope that an expansion of our current partnership agreements with Conservation Authorities and OMNR could serve to alleviate some of the workload pressures. Partnerships with would likely result in the delivery of a more consistent, transparent and predicable program in the Province.
- Governance Structures- DFO supports examining how government agencies can better coordinate activities, and streamline project review

times and work together to provide more balanced water management throughout the system.

- Aquatic Vegetation Growth: DFO acknowledges that there has been an increase in applications for large scale removal of aquatic vegetation through out the TSW system. Provincial Guidelines for Aquatic Plant Control have been developed for the Province of Ontario and all staff should be aware of the guidelines to provide clearer advice and better client service.
- Water Quality and Health of the Fishery: The economic contribution to communities due to fishing on the Trent Severn Waterway and associated lakes and rivers is significant. Greater public education to stakeholders, landowners and the community is required to ensure water quality does not deteriorate.
- Hydro generation: DFO has been made aware that there is potential for greater hydroelectric development along the waterway. DFO supports hydroelectric initiatives if they are developed with sustainable development goals and result in the no net loss of fish habitat.

Although not discussed at our meeting, I would like to identify some concerns pertaining to fish habitat management along the Trent Severn Waterway. There are many impacts which affect the mandate of Fisheries and Oceans. Some of which are; shoreline development and hardening, wetland loss, eutrophication of some lakes and to a lesser extent upland habitat losses and fragmentation. All negatively impact the productive capacity of fish habitats.

- Historical shoreline hardening/development along the waterway. The popularity of some of the vertical shoreline stabilization structures (e.g. armorstone and concrete walls), in situations where they are not necessary, have proven to be problematic and difficult to limit in the past as the criteria for which they can be considered is not strict enough. Often the TSW general policy of 25% frontage development has been applied to shoreline hardening, if applied at all- however because of the significant incremental losses associated with this type of work there needs to be a clearer stipulation on when shoreline hardening will be allowed and to what extent (i.e. after review by a coastal engineer) that softer stabilization techniques would not address erosion problems. Technically, when reviewing permitting applications, TSW staff have indicated that there is no jurisdiction above the HWL, however to maintain environmentally sustainable development, historical and cultural values, policy needs to go above the defined HWL.
- Balancing the need for TSW to draw water from upland lakes for navigation and flood control purposes while maintaining suitable water levels for fish to carry out their life processes during critical time periods.
- Lack of incentive for landowners to choose less obtrusive, more environmental friendly methods/techniques over more harmful ones.

- Consideration of the Federal Policy on Wetland Conservation (wetland policy) which has seven goals, one of which “is the no net loss of wetland functions on all federal lands and waters”.
- Lack of inventory on the historical natural characteristics on the Trent Severn Waterway to assess development changes over time and total losses of habitat to date.
- Enforcement of permitting on the Trent Severn Waterway. Increase of fines for infractions of TSW work permits or work without permits.

We would like to thank you for meeting with us to discuss the potential directions the review may take. Should you have any further concerns, comments or would like further input, please feel free to contact me.



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Attachments:

- DFO Referral Protocol
- Compliance Protocol
- Ontario Guidelines for Aquatic Plant Control
- MNR Guidelines for the Trent Severn Waterway: Water Level Management to assist the Sport Fishery in Lindsay District of the Ministry of Natural Resources.

