



**ONTARIO  
RIVERS  
ALLIANCE**

379 Ronka Road  
Worthington, ON P0M3H0  
LindaH@OntarioRiversAlliance.ca  
OntarioRiversAlliance.ca

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Megan McAndrew  
Policy Analyst  
Ministry of Natural Resources and Forestry  
Policy Division, Species Conservation Policy Branch  
300 Water Street  
Peterborough, Ontario  
K9J 8M5  
By Email: [recovery.planning@ontario.ca](mailto:recovery.planning@ontario.ca)

Re: EBR 012-6266 – Government Response Statement for the Spotted Gar

Dear Ms. McAndrew:

The Ontario Rivers Alliance (ORA) is a Not-for-Profit grassroots organization acting as a voice for several stewardships, organizations, and private and First Nation citizens who have come together to protect, conserve and restore healthy river ecosystems.

ORA is writing to offer our comments on the draft Ontario Government Response Statement (OGRS) for the recovery of the Spotted Gar (*Lepisosteus oculatus*).

The Spotted Gar is listed as threatened on the Species at Risk in Ontario (SARO) list, and is also listed as threatened under the federal Species at Risk Act (SARA). Fisheries and Oceans Canada has prepared the Recovery Strategy for the Spotted Gar in Canada in 2012 to meet its requirements under SARA. This recovery strategy was also adopted under the Endangered Species Act (ESA), with several additional survey locations included.

The draft OGRS noted the primary threats to the Spotted Gar, but failed to include the detrimental impacts that dams and weirs present. The Recovery Strategy for the Spotted Gar in Canada clearly reported that barriers to movement, such as dams, weirs and culverts restrict fish passage, and can limit the movement of individuals, and fragment populations. These structures can alter timing and duration of flow, water levels, restrict habitat availability, and fragment populations, which affects spawning, feeding, cover and migration. Additionally, winter drawdowns of hydroelectric reservoirs can eliminate all available food for juveniles.

One of the most significant reasons for the decline in many species of fish in Ontario, including the Spotted Gar, is the almost total lack of fish passage at most hydroelectric and water control dams. Without the provision of safe and suitable passage, fish are unable to move upstream to access critical habitat and spawning beds; and during downstream migrations many fish pass through the turbines and are killed or maimed.



Extreme fluctuations in water levels and flows associated with hydroelectric peaking facilities can also result in erosion of soils and sediments leading to increased turbidity, which can affect respiration and vision, and can smother Spotted Gar eggs.

The ECO stated in the 2014/2015 Annual Report Supplement,

*...ignoring the necessity for fish passage can create ecological costs for Ontario's fish species and river ecosystems. The ECO urges the MNR to fix this long-standing and significant ecological problem for existing and future projects.<sup>1</sup>*

**Recommendations:**

ORA recommends that the impacts of dams, weirs and culverts be clearly acknowledged and set out in the OGRS for the recovery of the Spotted Gar.

ORA also recommends including the requirement for robust mitigation of all dam/weir impacts, including effective upstream and downstream fish passage.

Thank you for this opportunity to comment!

Respectfully,

Linda Heron  
Chair, Ontario Rivers Alliance

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<sup>1</sup> *Environmental Commissioner of Ontario, Small Things Matter: Annual Report Supplement 2014/2015, P-262-274.*