15 November 2019

By Email

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Subject: Wiikwemkoong Islands Boundary Claim Final ESR – Response by the Georgian Bay Association with Supporting Documentation to Part II Order Request

Dear Ministers: This letter represents the response of the Georgian Bay Association (GBA) to the Final Environmental Study Report (ESR) released by IAO on August 1, 2019. Included in this letter is information in support of our Part II Order request.

Georgian Bay Association

GBA's mission is to work with our water-based communities and other stakeholders to ensure the careful stewardship of the greater Georgian Bay environment.

The GBA is a not-for-profit umbrella advocacy organization which represents the interests of its 19 member community associations, including the Northern Georgian Bay Association (NGBA). The NGBA will be submitting a separate response to the Final ESR.

The GBA represents approximately 3,000 families along the eastern and northern shores of Georgian Bay, with our communications and publications reaching around 18,000 individuals. The GBA dedicates itself to preserving the incredible, yet fragile, wilderness and waterways of these shores. The eastern Georgian Bay region is recognized as the Georgian Bay Biosphere Reserve by UNESCO. It is this environment that makes the Bay so enjoyable for residents and countless visitors, and which must be protected for generations to come.

Summary of content

The Ministry of Indigenous Relations and Reconciliation (MIRR, now IAO) released the Wiikwemkoong Islands Boundary Claim (the "Claim") Draft ESR in June 2017. GBA responded to the Draft ESR on September 13, 2017, detailing our concerns with the Draft ESR and the process followed to that point in time. With the release of the Final ESR it is our considered opinion that it is flawed. The Final ESR continues to ignore the key impacts that both GBA and NGBA identified in September 2017.

Moreover, the consultation process followed has been markedly inadequate. It is in stark contrast to the wide consultation process covering a range of stakeholders that was followed in the Algonquin claim process referred to below. Consultations have failed to reach a large number of people that would be affected by the loss of access to Crown lands for recreation purposes, and to reach citizens and organizations that would have serious concerns about the potential environmental impacts on the pristine wilderness areas in question.

Further, MIRR/IAO has never provided any assistance to NGBA and GBA that would help us address our concerns. Instead, they left the NGBA and GBA to their own devices to negotiate an agreement with Wiikwemkoong. IAO never provided NGBA/GBA with guidance on what would be required to have this agreement with Wiikwemkoong referenced in the Final ESR, as was our desire. We informed IAO in our response to the Draft ESR that it was imperative that this agreement be referenced in the Final ESR. However, we were only informed of the pending August 1 release of the Final ESR and that it would not reference the Wiikwemkoong-NGBA/GBA agreement during a call that we initiated with IAO's negotiator just 10 days before the Final ESR was released.

Despite the passage of two years since the release of the Draft ESR, not a single impact to the public or to NGBA members that we have raised during this process has been addressed in the Final ESR. Nor has IAO made any progress in the development of mitigating measures to address NGBA/GBA identified impacts, as is their responsibility under the Environmental Assessment Act.

We regard these omissions on the part of IAO as a complete and fundamental failure in its duties and responsibilities under the EA Act. Therefore, we are requesting a Part II Order (or "bump up") to an Individual EA. We believe that this request is fully justified in as much as IAO has failed to:

- address identified impacts
- identify and develop mitigating measures
- afford an adequate consultation process

It is essential that all parties understand that notwithstanding our Part II Order request, the GBA supports the settlement of the Wiikwemkoong central claim. However, we wish certain lands within the proposed settlement to become a recognized park, whether managed by Wiikwemkoong or co-managed by Wiikwemkoong and Ontario Parks. And we continue to assert that the Wiikwemkoong-NGBA/GBA agreement must be referenced in the Final ESR or related Provincial Environmental Assessment Record.

A bump up to an Individual EA provides the Province with the opportunity to embrace an alternative approach to the settlement process that should have been considered in the Class EA process, an alternative that will significantly reduce the potential for social and ecological impacts compared to the approach IAO has chosen, and that will be for the benefit of all. By "alternative" we refer to the Algonquin claim process, an excellent precedent in claims negotiations which afforded wide and beneficial consultations that we expand on later in this document.

Ultimately the goals of GBA and NGBA in the context of this claim and its settlement are to help preserve the pristine condition of the Crown Lands to be transferred as part of the settlement, and at the same time develop and strengthen our relationship with our Wiikwemkoong neighbours. The GBA believes the former goal will best be achieved by designating certain portions of the lands as a park, as noted above.

It is our sincere hope that the Ministry of Environment, Conservation and Parks will not approve the Class EA when, as described in this submission, viable alternatives would address the concerns of thousands of its citizens, and, at the same time, achieve the goal of IAO reaching a successful settlement of the Claim.

Contents of this Submission

A. Impacts of the proposed transfer of Crown Lands on NGBA members and others, and proposed solutions.

B. Failure of Class EA process to provide measures to mitigate Impacts – and our Wiikwemkoong-NGBA/GBA agreement

C. The Province's long-standing promise of a Park covering most of the area within NGBA's boundaries

D. The shortcomings and failures of the Draft ESR and the Class EA process

E. An alternative approach - the modified Fitzwilliam Island alternative

F. Lessons learned from the Algonquin Land Claim

A. Impacts of the Proposed Transfer of Crown Lands on NGBA Members and others, and Proposed Solutions

The environmental and social impacts of the proposed transfer of Crown Lands on the public and NGBA members have been previously addressed in our September 13, 2017 letter to MIRR in response to the Draft ESR. These impacts have been captured to only a limited extent in the Draft ESR and now the Final ESR. Since the NGBA and GBA identified these in their submissions of Sept 2017 and since NGBA will address these again in detail in its response to the Final ESR, we will only briefly identify these impacts at this time.

- **Recreational Access.** Limitations to recreational access to hitherto Crown Lands by NGBA members and other recreational users.
- **Impact on property values.** The Final ESR states that there will be no impact upon property values; the NGBA provides evidence that clearly refutes this claim.
- **Likely ecological impacts associated with the disposition of Crown Lands.** The Crown Lands within NGBA's association boundaries are (or were) slated to become a park under Policy P189 (see Section B below for more details). Any future potential impacts must therefore be measured against the relative impacts had this area indeed become a park as proposed. The only future use that will not result in environmental impacts (relative to the lands being parkland as originally proposed) would be the establishment of a park for the Crown Lands in the area that are part of the proposed settlement.
- **Potential loss of access to rivers and tributaries to Georgian Bay.** While access to these tributaries is guaranteed under the Navigable Waters Protection Act, there is evidence that this access could be compromised in the future.
- **Lack of Input to Planning for Lands Transferred out of Crown Land Ownership.** At present, property owners such as NGBA members have the right to comment on and influence possible development of Crown Lands. In the context of the Claim, NGBA would lose this right.
- **Access by campers, canoeists, kayakers and boaters.** Thousands visit this area and utilize it for camping each year. It is with the wider public's interests in mind that we voice our concern for the impact upon this constituency of Crown Land users. Killarney and French River Parks are at nearly 100% occupancy. While the Wiikwemkoong have suggested they may consider a limited number of designated campsites, this is not an assurance and a "limited number" may not afford access for the current 1000's of campers that visit the area each year, let alone accommodate future demand.

B. Failure of Class EA Process to Provide Measures to Mitigate Impacts – and our Wiikwemkoong-NGBA/GBA Agreement

We were disappointed that the Draft ESR did not identify "possible prevention and mitigation measures" to our identified impacts (as required under the Class Environmental Assessment for MNR Resource Stewardship and Facility Development Projects – pp. 31 and 33). This important oversight and failure of the Draft ESR denied NGBA membership of their only and rightful opportunity under the Environmental Assessment Act to comment on possible mitigation measures prior to release of the Final ESR.

In the Final ESR, it is unacceptable under the EA Act that no mitigating measures to both environmental and wider public or social impacts were proposed. In an attempt to offset the Province's failure to meet its obligations under the EA Act, the NGBA, supported by the GBA, had no recourse but to move forward independently and to work directly with Wiikwemkoong in developing an agreement on solutions to identified impacts and concerns. A great deal of effort has been expended over the past 3 years by all three parties; however, the agreement is still in draft form and as yet unsigned.

In a telephone conversation NGBA had with Chief Peltier on July 29, 2019, he said that he was also surprised by the sudden release of the Final ESR and that he did not have any warning. He also said they have never been asked by IAO to consider including the Wiikwemkoong-NGBA/GBA agreement in the ESR. IAO should have asked for this and managed this interaction. It is IAO's responsibility, not ours, to mitigate impacts to the proposed disposition of Crown Lands.

To clarify, the agreement has not yet been signed by the parties, although we believe it to be substantially complete. IAO is insisting that the agreement cannot be referenced in the Final ESR unless it is signed. NGBA and GBA have been, and currently are, striving to achieve this, but with minimal assistance from IAO, which has left us to negotiate with Wiikwemkoong.

C. The Province's Long-Standing Promise of a Park Covering Most of the Area Within NGBA's Boundaries

All parties recognize the unique and vulnerable features of the pristine lands included in the proposed settlement and the need to preserve them. Indeed, the Province has for years indicated its intentions for this area. The early identification of this area as a recreational reserve in 1962/1963 ended sales and development of Crown Land in the area. P189 went further, designating the area as a future Provincial Park. Both these actions by the Provincial government understandably established an expectation that this area would forever remain accessible only for recreation and be protected in its current pristine form. This expectation is

also reflected in property values. Sales and purchases of land in this area over past decades have a built-in value expectation that the Province would fulfill its commitment to making this area a park. In 1962/63 this region was designated under the Northern Georgian Bay Recreational Reserve Act (also known as the Killarney Recreational Reserve Act – Bill 119).

In 1999 this area was included in the strategy to increase Ontario's system of parks and protected areas, aka Ontario's Living Legacy and Land Use Strategy. This initiative included only nine signature and treasured sites in all of Ontario. The Killarney Coast and Islands Provincial Park area, which includes the islands within NGBA's association boundaries, was one of those nine sites; this formed the basis for Ontario Policy P189. Furthermore, the Provincial Government stated that management by Parks Ontario of protected and enhanced management areas would ensure the ecological and economic health of the Killarney area for future generations. (Note: the MNRF land use web site continues to designate this area as a "Recommended Provincial Park".)

The commitment to a sizable and continuous park along Georgian Bay's eastern and northern shores, for use by all people for all time, cannot be fulfilled anywhere else along this coast due to the lack of a contiguous, preserved area of Crown Land. This invaluable opportunity will be lost forever if commitments are not made now to ensure that this unique and pristine area is preserved by the establishment of a park.

The Province should have considered other alternatives to the Philip Edward Island and archipelago swap as "Alternative Lands" to compensate for privately owned lands originally included in the proposed settlement (namely, Fitzwilliam Island, the purchase of which MIRR/IAO chose not to pursue diligently). Also, George Island should not have been included as part of the claim as it is not included in the original Chief Toma map, as outlined further below. Guidelines on the preparation of a Draft ESR under the Class EA for MNR Resource Stewardship and Facility Development Projects, to which the proposed transfer of Crown Lands is subject, clearly call for an analysis of multiple alternatives (p. 31 and 33). Why was the purchase of Fitzwilliam Island not diligently pursued as an alternative within the Class EA Process? While it was added as an "alternative" in the time between the Draft and Final ESRs, it was never pursued earnestly as is explained below. And why were other parcels of Crown Land not considered and evaluated as alternatives?

Given that all parties, Wiikwemkoong included, acknowledge the merits of creating a park on most of the Alternative Lands, why should we together not look for a creative solution that creates a contiguous park between French River and Killarney Mountain Parks, all co-managed by Wiikwemkoong and the Province, with French River and Killarney Parks owned by the Province and Point Grondine/Philip Edward Island and its archipelago belonging to Wiikwemkoong? For more than three years NGBA and GBA have advocated without success that the Provincial government secure funding for a feasibility study to establish a park in support of negotiations with the Wiiky. Each year the Province has failed to provide the necessary funds requested by IAO.

A superior alternative that should have been considered is the purchase of Fitzwilliam Island at a fair market value, transfer that island to Wiikwemkoong as part of the settlement, and then develop a co-managed park for Crown Lands within the P189 boundaries and George Island. This would achieve Wiikwemkoong's stated goal of protecting the pristine nature of the Philip Edward Island and archipelago and their objective of providing much needed employment for their youth. We wholly reject any assertion that it is too late in the settlement negotiation process to reconsider a purchase of Fitzwilliam Island. The Province never diligently pursued a purchase of Fitzwilliam. Rather, it is our understanding that the Wiikwemkoong were at the forefront of the attempted negotiations with the landowner instead of the Province. Our suggestions for this superior alternative were made in response to the Draft ESR, but ignored. It is not difficult to reach the conclusion that the social and ecological impacts of the alternative we propose are significantly less than those associated with the proposed settlement identified in the Final ESR, and may be achieved at marginal additional cost. Why does IAO continue to ignore this win-win-win solution for the Wiikwemkoong, citizens of Ontario and property owners?

The Final ESR states that Ontario will settle the land claim in accordance with "certain terms and conditions". Is the long-term preservation of the land – land that was intended to be a park – not a viable term and condition and in keeping with the intent of an environmental impact study? We are often told by the Province that they cannot dictate to First Nations the use of lands to be transferred. We respect this; however, we reference the Environmental Evaluation Report used in the Algonquin settlement. It specifically states, "Following the transfer of lands to Algonquin ownership, any future proposed Algonquin land use will be subject to the same technical study requirements, provincial planning legislation and policies, and municipal planning requirements, as any other land use proposal."

The Algonquin Environmental Evaluation Report discusses the need for continued public use of lands that will be transferred to the First Nation and has identified what lands are to remain available to all (e.g. Algonquin Park). Why could this same condition not be possible in the context of the proposed Wiikwemkoong claim settlement? The inclusion of these conditions would again represent a superior alternative to the one selected in the Final ESR. The Province states that there are more individuals impacted in the Algonquin Claim area; however, that ignores the *extent* of the impacts on many NGBA cottage owners and also disparages and discounts the impacts on the thousands of campers that use the Crown Lands in the claim area every season for recreation.

The present condition of Crown Lands held as a recommended park by MNRF (but nonetheless part of the proposed settlement) is the basis for comparison of the environmental impacts of any future uses. Therefore, any use that is not a park or that does not commit to the same degree of preservation of the environment on equivalent terms will probably result in significant environmental and social impacts, irrespective of who implements future uses. This is contrary to the precautionary principle in environmental planning and contrary to current provincial policy. And to say that future development activities can be addressed and approved when they arise is unacceptable. Now is the time to address this issue and avoid future

problems, which can be done by placing similar conditions on future use as were applied in the Algonquin settlement terms.

D. Shortcomings and Failures of the Draft ESR and the Class EA Process

The Environmental Assessment Process represents the only way that members of the public can make known to IAO and MNRF their views on the proposed settlement of this land claim. And yet, it would seem from the manner in which the EA has been conducted that IAO and MNRF are merely going through the motions in order to clear another hurdle in reaching a settlement agreement. This, despite the overwhelming opposition to the inclusion in the claim of George Island, Philip Edward Island and archipelago, and the full P189 Park area without a commitment to a permanent park. How else can it be explained that the impacts to NGBA members and to campers and others using the Crown land in the area have been wholly ignored without presentation of any appreciable or potentially binding conditions or mitigation measures to address these impacts in the Final ESR?

The EA Act and its application are governed by Codes of Practice and specific guidelines for this particular type of Class EA. Reading pages 31 and 33 of the Class Environmental Assessment Guideline for MNR Resource Stewardship and Facility Development Projects on the requirements of Draft and Final ESR documents clearly indicates the complete inadequacy of this Final ESR. In discussions with professionals in the field of Environmental Assessment in Ontario, they were appalled by the failure of the Final ESR to meet the requirements of any other Level C Class EA in the Province (regardless of sponsoring Ministry or type of Class EA).

There are numerous fatal flaws in the Final ESR and the Class EA process that has been followed with respect to this proposed disposition of Crown Lands. These are extensive and are described in detail in NGBA's response to the Final ESR. We highlight the main points below:

- **Consultation**

  The number of open houses was limited and those that were held were in locations not representative of the affected parties. Outreach to other stakeholders was insufficient. Wiikwemkoong were afforded special status, contrary to the EA process. Past and present IAO advertising to promote awareness has been and continues to be totally inadequate.

- **Draft ESR Premature and both Draft and Final are incomplete**

  We advised MIRR at the time that the Draft ESR was premature. Only two alternatives were considered and the way they were framed (namely, accept the proposed settlement as presented or reject it) was such that any opposition to the ESR alternatives would be interpreted as opposition to the claim itself. By not addressing concerns raised by NGBA and GBA and by not considering other alternatives, it has had the effect of sending a message that the settlement is a done deal politically, fostered cynicism and discouraged additional public input.

The Province never made a direct and concerted effort to negotiate a fair and reasonable price with the private owner of Fitzwilliam Island to purchase the island and instead substituted Philip Edward Island and its archipelago plus various strategic parcels of onshore land (taken together, the “Alternative Lands”).

Contrary to IOA’s position, we maintain that the present condition of Crown Lands held as a recommended Provincial Park by MNRF under P189 (almost all of the Alternative Lands that are part of the proposed settlement and transfer) is indeed the basis for comparison of the potential ecological and social impacts of any future uses.

The Final ESR attempts to address impacts through vague statements that do not constitute mitigation measures, such as “Wiikwemkoong have indicated they are open to discussing potential options for allowing continued recreational access.” This does not meet the requirements of the EA process to provide mitigating measures; it only suggests that impact might be addressed in future discussions without listing any concrete options for doing so.

Many of the flaws highlighted here are in contravention of the EA Act, its Codes of Practice and the guidelines for the Class EA in this matter and represent strong grounds for our Part II Order Request.

E. The Modified Fitzwilliam Island Alternative

At the heart of our objections and regarding the disposition of Crown Lands beyond the original extent of the official Dept. of Indian Affairs Chief Toma map of 1896 and a subsequent map of “41 Fishing Islands”, has been the Province backing away from a 57-year commitment to preserve this area in its pristine form, and later through P189 to create a Provincial Park. The Province’s settlement proposal has had a deep emotional impact (and will have an even greater impact moving forward) on thousands of its citizens. All this resulted from the Province’s failure to purchase Fitzwilliam Island from a willing seller and return it to Wiikwemkoong, and instead offer the Phillip Edward Island and archipelago and other lands as alternatives.

The attempt to purchase Fitzwilliam Island was so poorly managed that one may be excused for concluding that it was never part of the plan. Similarly, we have learned from Wiikwemkoong and other sources that it has always been the intention of Wiikwemkoong to gain the P189 lands and George Island for years, well before any attempt to purchase Fitzwilliam Island.

The Final ESR suggests that “considerable and sustained efforts to negotiate a willing-buyer, willing-seller arrangement” were undertaken. This is patently untrue given what we have now learned. There clearly was no willing-buyer position on the Province’s part. It is also our understanding that the Wiikwemkoong led the discussions with the owner of Fitzwilliam Island, not the Province. This was inappropriate as it may be seen as a conflict of interest for the Wiikwemkoong who naturally desired the Philip Edward Island Archipelago.

We also understand that subsurface rights were not considered in the appraisal. NGBA lawyers Fasken Martineau researched the title on Fitzwilliam Island and advised that there is no question that subsurface rights should have been included in the appraisal value. Therefore, on this ground alone, the Province did not negotiate in good faith to purchase Fitzwilliam.

The owner of Fitzwilliam Island has also told us that he was never informed of the very significant impacts to a vast number of people of not selling (i.e. the loss of the Province's commitment to the P189 Park). This information should have been conveyed to the owner.

The Judge Poupore Notification Protocol of 1998 is no excuse that the Province would never be able to establish the P189 Park. The 1896 Dept. of Indian and Northern Affairs map of Chief Toma's description of the Fishing Islands and the subsequent 41 Fishing Islands map do not show either the Philip Edward Island Archipelago or George Island as part of the fishing islands originally sought by Wiikwemkoong.

The owner of Fitzwilliam Island was approached in 2015 and he indicated that he still wanted to sell to the Province. This information was relayed to the Province but they never acted on it.

We understand that the daughter of the owner of Fitzwilliam Island met with IAO In August 2017 to once again relay the fact that they are a willing seller. The Province never explained to us how they responded to this latest offer by the owner to sell.

The Fitzwilliam Island owner has recently indicated to NGBA that a bona fide offer to purchase was never made by either Wiikwemkoong or the Province and we understand that he has relayed this view directly to the Province.

This sequence of events suggests that the Province never intended to purchase Fitzwilliam Island.

One argument could be that the Province never realized the number of people (NGBA owners, families, campers and boaters) that would be affected by the selection of the alternative lands and who would object to the lack of a future commitment to a permanent park for the entire P189 area and George Island. The lack of understanding of the nature of usage by NGBA owners or the extent of usage by campers (as demonstrated by IAO/MNRF's lack of meaningful outreach) would suggest inadequate research and analysis. Nevertheless, the purpose of the EA is to discover that impact, and then to act on it.

The purchase of Fitzwilliam Island remains the leading alternative for the Province to pursue given the seller is willing. Any suggestion that it is too late makes a mockery of the EA Process and would again suggest that the EA Process was a rubber stamp for a pre-conceived plan and that the view of the vast majority of people affected by the disposition of Crown Lands can be ignored. Surely the Ministry of Environment, Conservation and Parks cannot approve the Class EA when viable alternatives remain to address the concerns of thousands of its citizens - at the same time as achieving the goal of IAO of reaching a successful settlement of the Claim.

We believe that this alternative that we previously proposed to IAO (in our response to the Draft ESR and in a meeting attended by the Assistant Deputy Minister) would achieve the goals of the Province, Wiikwemkoong, as well as the vast majority of people who historically (and currently) use the alternative lands and George Island.

The Modified Fitzwilliam Island Alternative is summarized as follows:

- The Province purchases Fitzwilliam Island at fair market value and returns it to Wiikwemkoong as part of the Claim; and
- In exchange for adding Fitzwilliam land to the Claim, agreement is reached between Wiikwemkoong and Ontario Parks on developing a co-managed park for P189 lands and George Island.

F. Algonquin Land Claim

We have reviewed the Environmental Evaluation Report (EER) that has been developed in support of the Algonquin Land Claim. We believe that the entire negotiation process used in the Algonquin settlement has been far more robust and inclusive than the one followed in this instance with Wiikwemkoong. For example, the three principal parties (Algonquin and the Federal and Provincial governments) together developed a statement of shared objectives early in the process but following a first round of public consultations which were important to defining objectives. These were reflected in the Agreement-in-Principle and will ultimately be included in the Final Agreement, which will become an Algonquin Treaty.

These objectives are:

- To establish certainty and finality with respect to title, rights and interests in the land and natural resources with the intention of promoting stability within the area and increasing investor confidence;
- To identify and protect Algonquin rights;
- To protect the rights of private landowners, including their rights of access to and use of their lands;
- To enhance economic opportunities for the Algonquin with the intention of also benefiting and promoting general economic and commercial opportunities in the area;
- To ensure that Algonquin Provincial Park remains a park for the appropriate use and enjoyment of all people;
- To establish appropriate and effective management of the lands affected by the settlement, consistent with the principles of environmental sustainability; and
- To continue to consult with interested parties throughout the negotiation process and to keep the public informed on the progress of negotiations.

In developing these objectives a clear path forward was established for the ensuing discussions with all stakeholders. We feel that a similar “best practices” process should have been followed with the Wiikwemkoong settlement. It is inclusive, provides for consultation with all stakeholders, and recognizes their interests, in particular the broader public interest in preserving and ensuring public access to significant natural areas in Ontario within the land claim area. The Wiikwemkoong claim process to date fails to do that, whether within the ESR framework or otherwise, and the Province has failed to provide any justification for the difference in the process.

Furthermore, the Province’s stated approach to the ESR contains a fatal flaw: stating that this process would only consider the impact of transferring the land to Canada for settlement purposes, and not the potential environmental impact of how the land could be used after the settlement. They imposed an artificial limitation on the study that prevented the basic purpose of an ESR from being served; namely, protection of the environment for the long term. This is in stark contrast to the approach taken in the Algonquin negotiation process.

An Individual Environmental Assessment would require an agreed-upon terms of reference for consultation between parties both for the EA Process and the Claim Settlement Process. The inadequate Class C EA Process followed to date has failed to consult impacted parties or address their concerns in any way. Its incompleteness and inadequacy have the potential to result in damage to the relationship between First Nations and non-First Nations people. The Class C EA has failed to develop an acceptable alternative and did not investigate an alternative with far less chance for ecological impacts and significantly fewer social impacts (i.e. the Modified Fitzwilliam Island Alternative described above). We also warned IAO that if they release the Final ESR without addressing the concerns of members of NGBA by including the agreement between Wiikwemkoong-NGBA/GBA, it would risk eroding this relationship.

In Conclusion

As repeatedly stated, we support a successful settlement of the Wiikwemkoong claim provided it recognizes and protects the pristine nature of the P189 lands and George Island, and allows for continued respectful use of areas of those lands to be designated as a park by not only cottagers but also canoeists, kayakers, campers and the many others who have in the past and will continue to enjoy these lands. We believe that the Province can successfully settle the Claim and address the concerns of those affected by:

1) Referencing in the Final ESR and Settlement the Wiikwemkoong-NGBA/GBA agreement that addresses impacts and solutions to NGBA members;
2) Purchasing Fitzwilliam Island at fair market value and returning it to Wiikwemkoong
3) Creating a co-managed permanent park of the P189 lands and George Island by Wiikwemkoong and the Province.

4) Pursuant to the granting of a Part II Order "bump up", conducting an Individual EA and following a process aligned with the Algonquin settlement process described herein.

We welcome any questions you may have and the opportunity to meet in order to discuss the recommendations contained in this submission.

Sincerely,

John McMullen
Past President
On behalf of the GBA Board

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