

Date: August .., 2017
To: wutclaim@ontario.ca
Attention: Alison McLaren, Senior Negotiator, MIRR
Regarding: Draft Environmental Study Report - Wiikwemkoong Islands - Boundary Claim Proposed Land Transfer - June 12, 2017 ("ESR")

I am writing to advise my dismay with this prematurely released and flawed Draft ESR. Had the Province completed the Draft ESR according to its own Class EA guidelines for MNFR Resource Stewardship and Facility Development, it would have served both the Wiiky and the citizens of the Province better. In particular, I strongly object to the language in the Draft ESR: "Potential uses to be made of the lands and any planning or development decisions are not assessed as part of this ESR undertaking to sell or dispose of the lands, as the future use of the property is not assured at the time of disposition". I argue that the present condition of Crown Lands held as a recommended Provincial Park by MNRF (specifically, 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. Similarly, any use that is not a park will surely result in very significant and adverse ecological and social impacts on the current long-term established users of this area. Accordingly I request that the Province ensures that all of the Alternative Lands described in the Draft ESR are designated as a park for the reasons set out below and because most importantly this will provide the optimum solution for all stakeholders and enhance good relations and collaboration amongst all the parties going forward:

1. Phillip Edward Island and its archipelago have been slated for designation as a park since 1962 under the North Georgian Bay Recreational Reserve Act, which was later reinforced by Policy P189 (Ontario's Living Legacy and Land Use Strategy), in order to protect one of the world's most unique and pristine natural areas.
2. It would allow for a continuous park system between the French River and Killarney Provincial Parks (including Pointe Grondine), which could be co-managed by Wiikwemkoong and the Province and thereby provide valuable employment opportunities for Wiikwemkoong.
3. I understand that the Agreement in Principle between Northern Georgian Bay Association (NGBA), Georgian Bay Association (GBA) and Wiikwemkoong, that is still under negotiation, intends to address NGBA and GBA's primary concerns related to the effects of the proposed land transfer on access etc. This Agreement has not been addressed in the Draft ESR, which is in contravention of Class EA process guidelines and which must be remedied. Furthermore kayakers, canoeists, boaters, campers and other local residents ("Other Stakeholders") should be granted similar long term access rights, but no attempt has been made by the Province to protect their interests in this respect. A park would solve all these access issues.
4. The park should be accessible for all people for all time. Both the NGBA and Other Stakeholders have used these Crown Lands for their enjoyment for more than 100 years. Their rights and privileges must be respected, and a park would achieve this.
5. Finally, the Province should have considered other alternatives as required by ESR Guidelines, which call for an analysis of multiple alternatives, and not just put forward Phillip Edward Island and its archipelago as "Alternative Lands" in lieu of and to compensate for privately owned Fitzwilliam Island, which the Province failed to acquire. I am also greatly concerned that the Province only considered a derisory \$ amount for Fitzwilliam at about 1/10th of its value, never submitted an offer and did not disclose to the owner full details of the impact on his neighbours and Other Stakeholders in Northern Georgian Bay of substituting the Alternative Lands, thereby creating an unwilling seller, which then triggered the Alternative Lands being included in the proposed claim settlement terms.

Whatever the outcome of the claim negotiations between the Province and Wiikwemkoong, I am in favour of continuing to develop an enduring and neighbourly relationship with the Wiikwemkoong people based on mutual respect.

Copy to: Hon. David Zimmer, Minister of Indigenous Relations and Reconciliation
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Hon. Kathryn McGarry, Minister of Natural Resources and Forestry minister.mnrf@ontario.ca

Hon. Chris Ballard, Minister of Environment and Climate Change minister.moecc@ontario.ca

[Insert name, position & email address of point person at your association]

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