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RE: *EBR Registry No. 011-9448 Development of Range Management Policy in support of Woodland Caribou (Forest-dwelling boreal population) Conservation and Recovery in Ontario*

This is in response to the above noted EBR posting regarding the development of Range Management Policy in support of Woodland Caribou (Forest-dwelling boreal population) conservation and recovery in Ontario. The Federation of Northern Ontario Municipalities (FONOM) wishes to address specific parts of the draft policy that are in need of attention. FONOM is concerned with the Ministry of Natural Resources (MNR) lack of transparency and the application of its own gathered data within the Range Management Policy.

- There are concerns about the MNR's transparency with the consultation process. The notice to invite the public to comment on the draft policy did not originally provide adequate time for stakeholder submissions and was posted during the seasonal period when public interest in new government initiatives is low. Although the deadline for submissions had been extended, it still raises concerns that adequate public and particularly Northern input was not initially considered.
- An apparent disconnect between the data gathered by the MNR and its application within the Range Management Policy is evident. By not addressing the need to modify the southern border further northward of the caribou range as FONOM supports, it is clear that the MNR is not paying appropriate attention to their own research. This impinges on future economic development in the southerly part of Northeastern Ontario where there is potential for mining exploration and forestry projects that are not currently being capitalized on.
- FONOM expresses disappointment concerning the MNR's inability to follow through with a promise to adjust the caribou line. The plan announces that its policies are developed based on science and designed to provide a responsive long-term strategy for recovering Ontario's Woodland Caribou, yet this does not appear to be accurate without acknowledgement of Climate Change and its potential to impact the data in coming years.

FONOM asks that the Ministry revise the draft policy and apply the updated data. FONOM also asks that the MNR modify the southern range border further north and that an acknowledgement of Climate Change be included within the policy's long-term strategy.

FONOM would be pleased to work the MNR on this matter.

Sincerely,

Alan Spacek, President,
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