



February 12, 2026

Guillaume Bujold-Tahan
Indigenous Relations team, Fish and Fish Habitat Protection
Regional Ecosystem Management Branch
Fisheries and Oceans Canada / Government of Canada

Re: Antoine Nation's Reply to DFO's email correspondence of January 26, 2026 (distributed electronically)

Dear Mr. Bujold-Tahan,

Thank you for your written response to the Antoine Nation's questions concerning the risk that the proposed fish passage for the Québec Temiskaming Dam Replacement would have on Antoine's Nation subsistence fishing rights below the dam. We appreciate the time and effort that you have invested in summarizing the state of the relevant research that appears to be driving DFO's approach to lake sturgeon conservation.

We agree in principle that fragmentation of habit, for any species, leads to a reduction in genetic variability but we are not convinced that fragmentation is the most important cause for the decline of lake sturgeon in the river segment below that dam nor do we believe that the proposed fish passage would result in significant defragmentation. There are a number of site-specific realities worthy of studying first before concluding that this fish passage would have any significant impact on lake sturgeon conservation. These are a) past vulnerability of lake sturgeon to over harvesting, b) only recent sport fishing moratorium of lake sturgeon by the Québec government, c) turbine mortality associated with the Otto-Holden power generating station, d) undocumented illegal harvesting of lake sturgeon, e) near absent enforcement presence, f) lake sturgeon population status in Lake Temiskaming, and g) undocumented effect of toxic substances originating upstream on the life cycle of lake sturgeon. Antoine Nation is not prepared to jump to the conclusion that, in this segment of the river, fragmentation is the primary cause of the decline of lake sturgeon.

As stated in your response, the fish passage would allow for upstream travel for multiple species, including lake sturgeon. Other research shows that these types of fish passages favour upstream migration and not downstream migration. In addition, there is no observable downstream migration of lake sturgeon over the dam, since this downstream migration pathway, available to lake sturgeon for more than a half century, would have resulted in an abundance of 'captured' lake sturgeon staging below the dam unable to make their way back up into Lake Temiskaming. This is simply not happening. We strongly believe that the fish passage would provide a nearly one-time passage for an unknown but few remaining lake sturgeons below the dam to enter Lake Temiskaming and mostly likely never return. We believe that other species that the Antoine Nation depends on would follow the same pattern. The Antoine Nation believes that a fish passage from an isolated river segment into a very large lakes and rivers complex would simply further exhaust the fish stocks below the dam. The fish passage would do

nothing more than further deplete the fish stocks in this reach of the river along with migration blockage and turbine mortality associated with the Otto Holden dam, over fishing and upstream pollution. In short, the proposed fish passage will like add a cumulative threat to the Antoine Nation`s subsistence fishing rights in the heart of its traditional territory.

Fragmentation is also a natural phenomenon that has not resulted in the extermination of fish species in naturally impounded water bodies. There are hundreds if not thousands of in-land lakes and river segments that have been naturally fragmented as a result of the receding Laurentide ice sheet and, in some cases, subsequent to additional iso-static rebound. It is entirely possible the some of the segments of the Ottawa river were naturally fragmented following the diminishing post-glacial ice water melting period or perhaps from even earlier ice ages that behaved similarly. The current locations of dams and power generating stations were selected in part at locations where the river has significant changes in elevation and these locations were likely natural migration blockage for lake sturgeon, leading to habitat fragmentation.

We concur that genetic diversity is diminished by fragmentation. What is not known is whether this loss in diversity significantly impacts reproduction and survivability at this site. Apparently, it does not in lakes that abound with walleye, pike, whitefish, bass etc. that are clearly isolated from more expansive habitats.

Finally, we have not seen any report on the status of lake sturgeon in Lake Temiskaming. They may also be in decline in this lake like they are in Lake Nipissing (Commanda, 2018). We therefore cannot conclude that moving lake sturgeon from below the Temiskaming dam into Lake Temiskaming further protects this species.

Based on your response letter, we can however conclude that the Antoine Nation`s subsistence fishing is certainly at risk of being negatively impacted and perhaps completely eliminated by preferred upstream migration.

The proponent for the reconstruction of the Temiskaming dam also consulted other operators of dams downstream of the Temiskaming dam as part of its EIS responsibilities and concluded that there is no possibility in the near nor medium term of defragmenting additional downstream sections. In our view, the proposed fish passage is a piece meal approach without appropriate assessment.

We therefore continue to believe that the proposed fish passage is not supported with a site-specific scientific and rigorous environmental assessment of the true costs and benefits to lake sturgeon, other species and the Antoine Nation`s indigenous rights. In addition, since the fish passage will now clearly impact many other species, we note that there have not been any environmental impact or indigenous rights assessments done on all these other species that the Antoine Nation depends on and that would with certainly migrate upstream into Lake Temiskaming.

There are also very few logistical advantages in installing the proposed fish passage during the reconstruction of the Temiskaming dam. In our discussions with the proponent during the EIS consultation, we were shown the proposed location of the fish passage. It is in no way attached to the dam`s structure. In our view, the fish passage can easily be construction at a later date, once the

appropriate studies and assessments are completed and conclude that a fish passage is the appropriate method of protecting lake sturgeon while not impacting the Antoine Nation`s subsistence fishing rights.

The Antoine Nation had also a question concerning the long-term impact of DFO`s defragmentation of the Ottawa River on the acceleration of upstream migration of invasive species from the Great Lakes all the way up into the ecologically sensitive upper reaches of the Ottawa River`s watershed. New crayfish species such as the marbled crayfish and the Louisiana red are already making their way up the river and with totally open passages to the Great Lakes, seriously threatening larger species such as the Asian Carp could catastrophically impact the upper reaches of the Ottawa River`s watershed. We note that DFO`s response did not address long-term impact of invasive species.

In closing, we support DFO`s interest in defragmenting habitat when and where it makes sense. We however respectfully continue to oppose the addition of a fish passage to the replacement of the Temiskaming dam at this time since it does not truly defragment habitat, it impacts many other species for which site-specific environmental assessments have been completely ignored and creates a real risk of destroying the Antoine Nation`s subsistence fishing in the downstream reach of the dam.

Alternatively, the Antoine Nation is prepared to support and to assist in the following initiatives:

- a) Lake sturgeon population assessment in the reach between the Temiskaming dam and the Otto-Holden power generating station including five years of consecutive underwater survey over the known spawning sites.
- b) The release of 20 to 50 lake sturgeon, tagged with ultra-sonic emitters, in the reach between the Temiskaming dam and the Swisha to better define the migration, availability of critical habitat and survivability of the species.
- c) The assessment of the status of lake sturgeon in Lake Temiskaming to determine if the upstream migration of lake sturgeon into the lake significantly improves their survivability.
- d) The stocking of lake sturgeon in Lake Temiskaming, if the status of the population indicates that short-term restocking would be an effective conservation strategy.

The Antoine Nation`s is prepared to lead these initiatives as part of its conservation commitment across its traditional territory.

Miigwetch,



Chief Davie Joannis

incl. Antoine Nation Band Council Resolution

c.c. PSPC, IAAC and Antoine Nation Councillors.