

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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OFAH FILE: 349A/794
April 17, 2015

Ms. Julie Sullivan, Park Planner
Ministry of Natural Resources and Forestry
Natural Resource Management Division
Ontario Parks, Northwest Zone
435 James Street South, Suite 221D
Thunder Bay, Ontario
P7E 6S8

Dear Ms. Sullivan:

Subject: EBR Registry Number 012-3329: Amend Regulation 316/07 under the Provincial Parks and Conservation Reserves Act to make minor amendments to the boundaries of LaVerendrye and Pigeon River provincial parks to add acquired lands.

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, subscribers and supporters, and 725 member clubs, we have reviewed the Environmental Registry (EBR) posting to amend regulation 316/07 under the Provincial Parks and Conservation Reserves Act to make minor amendments to the boundaries of LaVerendrye Provincial Park (LV Park) and Pigeon River Provincial Park (PR Park) provincial parks to add acquired lands. The OFAH has the following comments and concerns regarding these proposed amendments.

The OFAH finds the *Title*, *Description*, and *Purpose* of this posting misleading, as they do not make any reference to the other intention of the posting, to remove hunting from PR Park. We believe there is a potential that members of the public, who currently hunt or are interested in hunting in PR Park, may have overlooked this posting based on the introductory information provided. This could also be viewed by some as an attempt by the Ministry of Natural Resources and Forestry (MNR) to hide the proposal to ban hunting within PR Park behind the boundary changes. The OFAH suggests that the MNR provide a more detailed *Title*, *Description*, and *Purpose* in future EBR postings, to ensure all aspects of the posting are reflected for public consumption and understanding.

The OFAH supports the addition of 299 hectares of land to LV Park, with the understanding that these additional lands will provide increased public hunting opportunities. The OFAH is a strong supporter of the maintenance and enhancement of public hunting opportunities in provincial parks. The maintenance and expansion of hunting opportunities in LV Park is a step in the right direction by Ontario Parks and should be adopted by more parks across the province.

The OFAH fears that the 299 hectares of additional hunting opportunities in LV Park does not justify the loss of over 950 hectares of hunting opportunities proposed to the east in PR Park. PR Park is currently listed under regulation 663/98 of the Fish and Wildlife Conservation Act, Schedule 30, as lands in a provincial park that allow hunting. This posting proposes to amend the regulation to remove PR Park that would prohibit hunting in the park. The MNR points to the PR Park Management Plan as rationale for the proposed amendment. The current PR Park Management Plan was approved in 1994 (over 20 years ago) and states that hunting will not be permitted within the park; however, this has never been enforced beyond specific small areas of the park with high public use. In fact, there are currently signs posted in the park promoting hunting (see attached). Based on conversations with ministry staff, there have been no major issues with hunting within the park or conflict with park users.

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The PR Park Management Plan also states that there will be a mandatory 10-year review of the plan and the plan lifespan is 20 years. Considering the plan has not been reviewed and is now outdated, the OFAH questions the validity of making regulatory amendments based on this dated material. An amendment should be based on current and accurate data; therefore, the OFAH recommends that the MNRF proceed with the mandatory review of the PR Park Management Plan before making any amendments to the regulation. The interest in hunting and the number of hunters in Ontario has increased dramatically in Ontario over the past 20 years. The OFAH strongly believes that the public would recommend the maintenance of hunting within the PR Park, if a management plan review was undertaken.

It is important to note that licensed hunting is a safe and compatible activity. Hunting is one of the few recreational activities that requires proof of competence before engaging in the activity, through the mandatory hunter education and firearms safety courses. Statistics Canada has stated that the activity of hunting is measurably safer than bicycling, boating, swimming, horseback riding, and most recreational sports. Any existing multi-use areas (provincial parks) that allow hunting should be maintained/enhanced where possible. Hunting also provides many secondary benefits including proactive wildlife management, socio-economic benefits to Ontario Parks and the surrounding communities, and many ecological benefits.

In conclusion, the OFAH supports increased public hunting opportunities that comes with the addition of 299 hectares of land to LV Park. The OFAH does not support the proposed amendment to regulation 663/98 to remove the existing hunting opportunities in PR Park. We recommend that the PR Park Management Plan be updated (over 20 years old) to better reflect the public perception on hunting with PR Park before proceeding. Hunting is a safe and compatible activity and should be maintained/enhanced where possible across Ontario.

The OFAH appreciates the opportunity to provide comments and would be happy to meet with Ontario Parks to discuss hunting within provincial parks further.

Yours in Conservation,



Chris Godwin, M.Sc.
OFAH Land Use Specialist

CG/gh
Attach.

cc: OFAH Zone B Executive
OFAH Land Use/Access/Trails Advisory Committee
Angelo Lombardo, OFAH Executive Director
Greg Farrant, OFAH Manager, Government Affairs & Policy
Matt DeMille, OFAH Manager, Fish & Wildlife Services
OFAH Fish & Wildlife Staff

