

# ONTARIO FEDERATION OF ANGLERS & HUNTERS



*Ontario Conservation Centre*

P.O. Box 2800, 4601 Guthrie Drive, Peterborough, Ontario K9J 8L5  
Phone: (705) 748.6324 • Fax: (705) 748.9577 • Visit: [www.ofah.org](http://www.ofah.org) • Email: [ofah@ofah.org](mailto:ofah@ofah.org)

OFAH FILE: 407/794  
August 13, 2015

Public Input Coordinator  
Wildlife Policy Section  
Ministry of Natural Resources and Forestry  
300 Water Street  
Peterborough, Ontario  
K9J 8M5

Dear Sir or Madam:

Subject: Ontario's Moose Project – Phase 2 – Review of Factors Potentially Affecting Moose

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest non-profit, conservation-based organization, representing 100,000 members, subscribers and supporters, and 725 member clubs. Thank you for following through on your commitment to assess the broad suite of factors that affect moose populations, and for providing the public with another opportunity to comment on Phase 2 of the Moose Project. We respectfully submit the following comments and recommendations for your consideration.

## General

The OFAH considers moose hunting to be one of the premier hunting opportunities in the province, enjoyed by over 100,000 people annually. For many, it is a cherished opportunity for family and friends to collectively enjoy an outdoor heritage activity. **Conservation of the moose resource is the OFAH's highest priority. As such, the OFAH seeks to ensure the protection and enhancement of the moose resource to provide optimal sustained recreational opportunities for the continued social and economic benefit of the people of Ontario.**

The OFAH has been actively involved in the Moose Project since its inception, and we have communicated our concerns and recommendations regarding moose management to the MNRF in previous communications. For convenience, we are including those concerns and recommendations in this submission.

The Regulation Decision Notice related to the Phase 1 public consultation states that many commenters expressed concerns about the broad suite of factors affecting moose, which were out of scope at the time. Many moose hunters might feel that they have already had an opportunity to express their concerns and recommendations and, therefore, may be less likely to participate in the Phase 2 consultation.

## Recommendation:

1. The OFAH insists that the MNRF carry forward all relevant comments from Phase 1 to the current Phase 2 consultation.

## Supplemental Material

In the supplemental material entitled "Factors That Affect Moose Survival," you provide an overview of six factors for consideration by the public. Only three of those factors (hunting, habitat, and climate change) include an explanation of "What We're Doing," leaving the public to guess at the MNRF's current actions to address the remaining topics (bears, wolves, and parasites/disease).

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**Wildlife Management Unit (WMU)-Specific Population Objectives**

There seems to be little consistency between districts with respect to WMU-specific population objectives. Many districts use established and approved population objectives (some of which are admittedly outdated), while others are using “draft” objectives that have not been subject to public consultation.

**Recommendation:**

2. Consult with the public on the updated draft population objectives that were provided to Moose Project Focus Group participants.

**Predator Management**

Moose populations are influenced by the combined effects of predation, harvest, habitat quality, disease, and weather. Of particular concern is the impact of predators on calf survival and recruitment. Low mid-winter calf:cow ratios have been documented in several northern WMUs. Unfortunately, the MNRF continues to marginalize the impact of predators on moose populations despite overwhelming evidence that wolves and black bears can be significant predators of moose calves (Keech et al. 2011; Nilsen et al. 2005; Patterson et al. 2013; Zager and Beecham 2006). The MNRF has claimed repeatedly that it cannot manage predator populations, while simultaneously upholding the cancellation of the spring bear hunt and restrictions on wolf hunting in Northern Ontario. The harvest of black bears in the spring has the ability to reduce moose calf predation by lowering bear numbers immediately prior to and during moose calving. Furthermore, the MNRF limits wolf harvest in northern WMUs by maintaining overly-restrictive bag limits of two wolves/coyotes per hunter per year, and requiring hunters to purchase individual seals.

In November 2014, the OFAH contacted the MNRF Wildlife Policy Section and made several recommendations toward better wolf and coyote management in Northern Ontario. Our subsequent meetings have been beneficial, and we look forward to continuing to work with MNRF staff to enhance wolf and coyote hunting opportunities. We believe that better canid management is important, sustainable, and justified in and of itself, and will also provide benefits to the current moose recovery efforts.

The supplemental material provides an overview of the moose calf survival study that was conducted in Algonquin Provincial Park. The material states that “the higher numbers of adult male bears found in the park may account for the higher rates of moose calf predation, since male bears may be more effective predators of moose calves than female bears.” The spring bear hunt focuses on male bears (~70% of the total harvest), and could, therefore, aid in the recovery of moose populations by reducing predation pressure on moose calves. The OFAH does not believe that targeted bear control is currently required, but we firmly believe that effective black bear management includes a spring hunt. Furthermore, the spring bear hunt would apply sustained pressure to the bear population and would alleviate concerns about the short-term effects of targeted bear removal efforts as listed in the supplemental material.

**Recommendations:**

3. Re-instate the spring bear hunt, for residents and non-residents, across all of bear range in Ontario.
4. Liberalize predator hunting in Northern Ontario by separating management of wolves and coyotes. Other management options could include allowing party hunting for wolves and reducing the cost of non-resident wolf game seals to encourage non-residents to harvest wolves.

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### **Habitat Management**

Moose have a range of habitat requirements, which change according to season and various life history events. Aquatic feeding areas, mineral licks, upland deciduous, early successional forests, clear-cuts, and heavy conifer stands are all important to moose at various times of year. Moose rely on forest disturbance, including natural disturbances (wildfires) and logging practices that emulate natural disturbances, to provide their habitat requirements. Over the past few decades, the MNRF forest fire suppression efforts have limited the amount of natural disturbance on the landscape. As a result, logging practices that sought to emulate natural disturbance became increasingly important for the provision of moose habitat (although some researchers have concluded that Canadian logging practices fail to emulate natural disturbance; McRae et al. 2001). The government has timber management guidelines for moose habitat for the purpose of assisting resource managers in maintaining or creating the diversity of age classes and species of vegetation that provide habitat for moose. Since its peak in 2001-2003, the total hectares of forest harvested in Ontario has declined dramatically (State of Ontario's Forests). For instance, the Lakehead Forest in WMU 13 is currently in its sixth year of a 10-year plan, but has only harvested 26% of the planned harvest (34% lower than expected) due to mill closures and reduction in timber demand (MacIsaac 2013). Combined with continued fire suppression efforts, this could be limiting the amount of moose habitat that is being created. Over time, the lack of disturbed habitats will reduce the carrying capacity of the landscape for moose. Several researchers have concluded that moose productivity is directly linked to habitat quality, with more calves being produced in areas of highest habitat quality (Bjorneraas et al. 2009; Boertje et al. 2006; Boertje et al. 2007; Keech et al. 2000).

### **Recommendations:**

5. Model existing and predicted moose habitat to verify the carrying capacity of the landscape (Moose Management Policy, Strategy 1.12). This will aid in setting population objectives, help direct forestry activity, and could allow districts/regions to reduce fire suppression efforts in areas where moose habitat is lacking.
6. Re-evaluate fire suppression policies in areas where the amount of moose habitat is insufficient to meet population objectives (recognizing the need to protect human and natural heritage values from destruction).
7. Ensure current forestry practices (type and amount) are sufficient to create high-quality moose habitat, and that forest regeneration favours species beneficial to moose. This includes adhering to timber management guidelines and auditing of forestry practices to ensure guidelines are effectively creating moose habitat as expected.

### **Harvest Management**

With an equal number of moose and licensed moose hunters, the moose hunt is arguably Ontario's premier big game hunt. The hunt's popularity necessitates an adaptive and highly-regulated harvest management system that provides sustainable benefits to all resource users. In order to be effective, this system must account for all factors influencing the provincial moose population. The MNRF currently collects harvest information from licensed hunters that is sufficiently accurate to make management decisions, but many districts have little confidence in their estimates of subsistence harvest levels. Without a reasonably accurate estimate of Aboriginal harvest, it is challenging to properly manage the moose resource.

### **Recommendations:**

8. Engage all First Nation and Métis communities in confidential discussions to obtain reliable estimates of subsistence moose harvest, and to request Aboriginal involvement in moose management (Moose Management Policy, Strategies 1.8 and 1.11).
9. Monitor trends in harvest and mid-winter calf:cow ratios to assess the impact of the recent changes to licensed moose hunting seasons.

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**Climate Change and Deer Management**

The North American range of white-tailed deer is expanding northward into habitats that have historically supported high density moose populations. Several North American jurisdictions have documented moose population declines as deer density increases. Whether moose populations decline as a result of increased predation by wolves or as a result of disease spread from white-tailed deer, is the subject of intense debate and research (Whitlaw and Lankester 1994; Lenarz 2009; Nudds 1990).

Regardless, climate change is allowing Ontario's deer population to expand northward into core moose range, bringing with it concerns about the future health of those moose populations. The *Cervid Ecological Framework* (CEF) provides strategic direction for managing co-existing ungulate species. The Framework directs the MNRF to manage for high moose and low deer densities in Cervid Ecological Zones C1 and C2.

**Recommendation:**

10. Assess white-tailed deer population status in core moose range to ensure populations are being maintained at sufficiently low densities to ensure healthy moose populations (Moose Management Policy, Strategy 1.7). If deer populations are deemed to be above the desired density, liberalize deer hunting opportunities until deer density reaches the objective.
11. Conduct and report publicly the results of the Monitoring and Research Recommendations outlined in Climate Change Research Report CCRR-26.
12. Establish a citizen science initiative to monitor the prevalence, extent, and impact of winter ticks on moose in areas of concern. Local Citizens Committees, rod and gun clubs, and interested members of the public are keen to become involved in moose management. A similar pilot project was conducted in Northeastern Ontario in early 2015, and could be used as a model for future initiatives.
13. Re-establish Provincial/Regional Moose Technical Committees tasked with managing moose populations, and identifying data and science gaps that need to be filled, in order to ensure the continued sustainability of Ontario's moose populations. Membership could include MNRF biologists and foresters, as well as representation from the OFAH and other stakeholder groups.

Ontario moose hunting is economically very important, especially in Northern Ontario, where hunters annually contribute tens of millions of dollars to local and provincial economies. The moose hunt is also culturally significant, not just for the healthy meat and the recreation it provides, but also because it signifies an annual gathering of friends and family to celebrate important traditions. The OFAH looks forward to working with the MNRF to ensure healthy and sustainable moose populations across their range in Ontario for current and future generations.

Yours in Conservation,



Mark Ryckman  
Senior Wildlife Biologist

MR/gh

cc: OFAH Board of Directors  
OFAH Big Game Advisory Committee  
Angelo Lombardo, OFAH Executive Director  
Matt DeMille, OFAH Manager, Fish & Wildlife Services  
OFAH Fish and Wildlife Staff