

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 • Email: ofah@ofah.org

OFAH FILE: 408E/794
September 8, 2014

E-MAILED
09/08/14

Mr. Mike Hall, Area Biologist
Ministry of Natural Resources and Forestry
3767 Highway 69 South
Sudbury, Ontario
P3G 1E7

Dear Mr. Hall:

**Subject: Elk Population Objective for the Nipissing French-River Herd (Sudbury)
EBR Registry Number 012-0370**

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 720 member clubs. In response to the proposed population objectives for the Nipissing/French River (NFR), we respectfully submit the following comments and recommendations for your consideration.

General

The OFAH fully supports the establishment of a population objective for all elk herds in Ontario as a necessary first step towards effective, sustainable management. The process for setting a population objective is an exercise that combines aspects of science, sociology, and economics. Section 2.2 of the *Elk Population Objective Setting Guidelines* lists the considerations in setting population objectives and includes habitat suitability, presence of other cervid species, area characteristics, public interests, Aboriginal considerations, and elk-ecosystem interactions. The public, understandably, expects a draft population objective to be supported by a certain level of technical detail. Unfortunately, the draft NFR population objective fails to provide even the most basic level of technical detail, depriving the public of important information that is required to make an informed decision. The document claims that "habitat is not considered limiting based on desktop analysis," but the results of these analyses are conspicuously absent.

1. **At what elk density is habitat predicted to be limiting for the NFR elk population?**
2. **Did habitat analysis results suggest that active habitat management is/will be required to achieve the population objective?**

Monitoring

The success of any elk management plan will be determined by the effectiveness of its monitoring plan; in the absence of monitoring it is impossible to know when the population objective has been achieved. Given its current size, it will take several more years of active management to achieve the objective in the NFR.

3. **The OFAH recommends that the MNRF continue to collar sufficient numbers of elk in the NFR to ensure that the herd can be effectively monitored into the future.**
4. **In the interest of adaptive management, we further recommend an annual review of population status and the success of management prescriptions in the NFR.**
5. **We recommend that the MNRF develop individual management plans for all elk herds in Ontario immediately following adoption of population objectives.**

...2

ONTARIO FEDERATION OF ANGLERS AND HUNTERS

Mr. Mike Hall
September 8, 2014
Page Two

Harvesting

Local Aboriginal communities have begun harvesting elk in both the Bancroft/North Hastings (BNH) and the Lake Huron North Shore (LHNS) elk restoration areas. The OFAH recognizes the constitutionally-protected rights of Aboriginal people to harvest wildlife, but the MNRF has a legal responsibility to ensure that any harvest (Aboriginal or otherwise) is sustainable. To our knowledge, there is no evidence to suggest that harvest of elk is sustainable for any herds in Ontario other than BNH. Therefore, no elk should be harvested in the NFR (by Aboriginals or non-Aboriginals) until the population objective has been set by the MNRF and achieved.

6. **Has the MNRF initiated communications with local communities in the NFR area to discuss their interest in harvesting elk?**
7. **What enforcement actions will the MNRF pursue if Aboriginal communities harvest elk in the NFR prior to achieving the population objective?**

Natural Mortality

As noted in the document, the NFR elk population continues to experience significant mortality from predators, collisions, and accidents. The document states that mitigating mortality will be considered as a management option, but fails to detail how mortality would be mitigated. We concede that management prescriptions are more appropriately outlined in a herd-specific management plan, but in the absence of this plan it would be helpful to know exactly how the MNRF plans to achieve the stated population objective.

8. **How does the MNRF plan to mitigate mortality in the Nipissing/French River herd?**

The OFAH is very proud to be a founding partner and ongoing supporter of Ontario's elk restoration program. Our organization has made significant contributions financially, technically, and physically through committed member volunteers at all stages of the elk restoration program. We are committed to sound, science-based management of Ontario's elk populations, with the goal of creating healthy and sustainable elk populations that can support a licensed harvest. We look forward to continuing our conservation partnership with the MNRF as it embarks on this new phase of elk management in Nipissing/French River.

Yours in Conservation,



Mark Ryckman, M.Sc.
Senior Wildlife Biologist

MR/gh

cc: Deb Stetson, MNRF, Manager, Wildlife Policy Section
OFAH Board of Directors
OFAH Big Game 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