OFAH F11 F: 430/794
November 26, 2013

Mr. Jeff Bonnema, Quetico Provincial Park Superintendent
Ministry of Natural Resources
Regional Operations Division, Northwest Region
Atikokan Area Office
108 Saturn Avenue,
Atikokan Ontario
P0T 1C0

Dear Mr. Bonnema:

Subject: EBR Registry Number PB06E2023: Quetico Provincial Park Management Plan Review

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, subscribers and supporters, and 710 member clubs, we have reviewed the preliminary Quetico Provincial Park Management Plan. We have identified some concerns with the Preliminary Park Management Plan and have provided additional management options for your consideration below.

The OFAH fully supports the statement “a major emphasis in the planning and management of Quetico is the development and improvement of opportunities for northern access” (pg. 28). Accesses for fishing and recreational opportunities are diminishing across the province. It is important to preserve and promote access routes to and within Provincial Parks. The OFAH supports the proactive approach to increase accessibility to the northern portion of the park in the Quetico Park Management plan.

The OFAH is extremely disappointed that proactive wildlife management was still not included as a management option(s) presented for public consultation. During the background information stage in October 2007, the OFAH requested that deer hunting be included as a management option during the park management planning process. We repeated this request with in-depth rationale in our comments on the Quetico Provincial Park Management Options review in October 2010. We see on page 59 and page 90 (Appendix C) of the preliminary Quetico Provincial Park Management Plan, that our comments were received; however, proactive wildlife management was still not considered as a management option.

The OFAH acknowledges that hunting is not generally permitted in wilderness class parks; however, we also believe that adaptive management can incorporate strategies such as hunting in wilderness parks, especially where they can be used to “protect significant features, yet allow opportunities for recreation and heritage appreciation” (Pg17). Hunting is a long-standing tradition in Ontario and is a very popular recreational activity for heritage and sustenance. Allowing regulated hunting opportunities within Quetico Provincial Park has the potential to fulfill many of the objectives of the Ontario Provincial Parks and Conservation Reserves Act (2006), such as “to permanently protect representative ecosystems, biodiversity and provincially significant elements of Ontario’s natural and cultural heritage and to manage these areas to ensure the ecological integrity is maintained.” This would also fulfill the commitment to “consider in future park management planning for existing provincial parks, the opportunity to provide additional hunting opportunities.” in the Ontario’s Living Legacy Land Use Strategy (1999).
The OFAH has developed the following to highlight the potential benefits of allowing a regulated hunt in Quetico Provincial Park and to address any concerns surrounding this traditional activity:

Safety: Hunting in Ontario is one of the few recreational activities that require proof of competence before engaging in the activity. Licensed hunters in Ontario must pass both the Canadian Firearms Safety course and the Ontario Hunter Education course before obtaining necessary hunting licenses. According to the Canada Safety Council and the National Safety Council, hunting is responsible for only 0.001% of accidents in Canada, which is far less than car accidents, insect bites, contact sports and even lightning strikes. Clearly, hunting is not a “high risk” activity and therefore should be compatible with Quetico Park Policy. There are many examples of publicly accessible multi-use lands in Ontario where hunting is incorporated without issue (Darlington Provincial Park, Algonquin Park, Kawartha Highlands Signature Site, etc.). Depending on the location, size and type of land, hunting can be managed as open access or controlled. There are many simple and effective methods to control hunter numbers (permis, limited parking spots, specified blinds, etc.) if necessary. In areas where there is a legitimate public safety concern, wildlife populations can be managed using shotguns and/or muzzleloader and/or bows-only seasons (e.g. City of Thunder Bay bow hunt).

Liability: Many landowners and operators are concerned with liability. As a result, proof of insurance (e.g. OFAH membership $3,000,000 public liability insurance coverage) has been used as a requirement to participate in public hunting opportunities (e.g. Simcoe County Forest).

Wildlife Management: The Ministry of Natural Resources (MNR) regulates the harvest of game species in Ontario. The absence of active harvest of game species (e.g. white-tailed deer) can result in overabundance, leading to over browsing, lower biodiversity and reactive culling of nuisance animals. The Quetico management plan states that “nuisance animals may be trapped and removed or dispatched under the supervision of, or directly by, MNR staff” (pg. 38). Licensed hunting is a low impact conservation activity that prevents wildlife populations from reaching nuisance numbers, while contributing to the maintenance of ecosystem health, biodiversity and overall ecological integrity. All publicly accessible lands should utilize an adaptive management approach including regulated harvest by licensed hunters to meet their management objectives. Also, section 7.9 (pg 37) states that “Quetico Provincial Park is located within Wildlife Management Unit 11C, hunting for game mammals, game birds and migratory game birds is prohibited by the Fish and Wildlife Conservation Act, 1997.” Although Quetico Provincial Park does not currently permit hunting within the park, this statement is misleading and suggests that hunting is not permitted within any Provincial Parks to comply with the Fish and Wildlife Conservation Act. This is not correct. In fact, there are many provincial parks across the province that allow hunting. A complete list of provincial parks where hunting is permitted can be found on page 28 of the 2013 hunting regulation summary.

Fair Access for Heritage and Cultural Activities: The OFAH strongly supports fair sharing of our natural resources. We see in Section 7.1 (pg 29) that hunting is permitted for aboriginals in accordance with section 35 of the Constitution Act, 1982. The OFAH does not dispute valid aboriginal rights and claims; however, we believe that publicly accessible areas should be opened to licensed hunters as well to help maximize the overall benefits. We believe that wildlife populations can be cooperatively harvested to efficiently and effectively meet management targets. The fact that non-licensed hunting is currently occurring within Quetico Provincial Park with minimal negative ecological impacts provides great groundwork for opening the park to licensed hunters.
Sustainable Development and Socioeconomics: In section 6.4 (pg. 28) of the Quetico Provincial Park Management Plan, one of the management intentions for the park is to “increase the economic impact of Quetico on the surrounding local Atikokan area.” Allowing licensed hunting in Quetico Provincial Park would generate revenue for both the park (e.g. permits) and contribute license/game seal revenue directly back into provincial fish and wildlife management through the Fish and Wildlife Special Purpose Account. Local businesses and communities would also benefit from the presence of licensed hunters, who require fuel, food, equipment, supplies and accommodation. Hunters would also be present during off-peak seasons, as hunting occurs outside of typical tourist seasons, generating revenue in local communities during these “slow seasons.”

Research & Monitoring: Section 10.1 (pg. 56) of the Quetico Provincial Park Management Plan states that one of the resource stewardship priorities is “wildlife monitoring such as moose.” Hunters often serve as the eyes and ears of wildlife managers, providing crucial data on the number of animals observed and harvested in an area. The Ministry of Natural Resources uses harvest data to estimate population densities and determine quotas for many game species in Ontario. By allowing hunting within Quetico Provincial Park, large geographic gaps in data collection could be filled allowing for increased accuracy in population estimates for management decisions.

In conclusion, it is clear that allowing hunting by licensed hunters is a feasible, safe and efficient method of wildlife population management in Quetico Provincial Park that promotes and conserves the rich culture, heritage, and tradition of hunting in Ontario. The OFAH recommends that active wildlife management, using licensed Ontario hunters, be presented as a management option in the Park Management Plan.

We look forward to future opportunities to work collaboratively with the MNR and Quetico Park officials to determine the best method of introducing ongoing harvest of game species by licensed hunters for wildlife management within the park.

Yours in Conservation,

Chris Godwin
Land Use Specialist

cc: OFAH Board of Directors
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