

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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OFAH FILE: 408E/794
October 23, 2014

Mr. Jim Trottier, Management Biologist
Ministry of Natural Resources and Forestry
62 Queen Street
Blind River, Ontario
P0R 1B0

Dear Mr. Trottier:

**Subject: Elk Population Objective for the Lake Huron North Shore Herd (Blind River)
EBR Registry Number 012-2541**

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 Lake Huron North Shore (LHNS), we respectfully submit the following comments and recommendations for your consideration. We appreciate the opportunity to comment, as well as the additional technical information that was provided during the review process.

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. One purpose of the elk restoration program was the establishment of self-sustaining elk populations that could support regulated hunting. The OFAH fears that a population objective of 300 animals in LHNS is insufficient to meet the demands of consumptive and non-consumptive users of the elk resource.

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 (150-200 elk), it will take several more years of active management to achieve the population objective in LHNS.

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

...2

Mr. Jim Trottier
October 23, 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 LHNS restoration area (by Aboriginals or non-Aboriginals) until the population objective has been set by the MNRF and achieved.

Sub-Herd Objectives

Laird Sub-Herd

The OFAH generally agrees with an objective of 40 elk in Laird Township, but we believe that habitat availability could support a slight increase in this sub-herd.

Kynoch Sub-Herd

The Kynoch area has experienced ongoing conflict since elk were released in 2001, and has created a sense of anger and resentment between landowners and the provincial government. To address the concerns of landowners, the MNRF removed several elk from this area in 2004 and translocated them to Elliot Lake. We believe that it is unrealistic for landowners to expect an absence of conflict, and that many landowners are not doing everything in their power to prevent conflict. As such, we do not agree with the need to reduce the size of the Kynoch herd. Furthermore, a reduction of six elk (from 16 to 10) will effectively do nothing to prevent further conflict in this area.

Parkinson Sub-Herd

This sub-herd contains approximately 50% of all elk in LHNS. The OFAH recognizes that this sub-herd is responsible for ongoing elk-landowner conflict; nevertheless, we recommend maintaining this sub-herd at its current level to act as a source of elk for surrounding areas.

Elliot Lake Sub-Herd

Since elk were originally released in LHNS, the MNRF has twice translocated animals to an area north of Elliot Lake. This area is characterized by low human population density, decommissioned mine sites, and habitat that is capable of supporting a sizeable elk population. We strongly support the MNRF's objective to increase this sub-herd, and recommend the identification of habitats within existing elk range that can be restored to support a larger elk population.

Iron Bridge Sub-Herd

The OFAH fully agrees with the need to remove elk from the Iron Bridge area. We strongly recommend that the MNRF translocate this sub-herd to the Elliot Lake area that has demonstrated the ability to support a large elk population without conflicting with landowners and the public.

Remaining Areas

We are very concerned that achievement of the LHNS population objective is contingent on a 647% increase in the elk population outside of existing sub-herds. The OFAH believes that this is an unrealistic goal, and one that almost ensures that the population objective will not be achieved for decades.

ONTARIO FEDERATION OF ANGLERS AND HUNTERS

Mr. Jim Trottier
October 23, 2014
Page Three

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 MNR as it embarks on this new phase of elk management in Lake Huron North Shore.

Yours in Conservation,



Mark Ryckman, M.Sc.
Senior Wildlife Biologist

MR/gh

cc: Deb Stetson, MNR, Manager, Wildlife Policy Section
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