

# ONTARIO FEDERATION OF ANGLERS & HUNTERS



*Ontario Conservation Centre*

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May 19, 2015

Ms. Ilsa Langis, Management Biologist  
Ministry of Natural Resources and Forestry  
Regional Operations Division  
Southern Region, Peterborough District  
300 Water Street, 1<sup>st</sup> Floor, South Tower  
Peterborough, Ontario  
K9J 8M5

Dear Ms. Langis:

Subject: EBR Registry Number 012-3903: Changes to the Ontario Fishery Regulations for Walleye on Lake Scugog

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, subscribers and supporters, and 725 member clubs, we would like to thank the Ministry of Natural Resources and Forestry (MNRF) for the opportunity to comment on the proposed regulation change for Walleye on Lake Scugog. We have reviewed the proposed changes and present our comments below.

First and foremost, the OFAH would like to state that the proposed regulatory options are insufficient in isolation to address the Walleye population declines in Lake Scugog. There is a lack of scientific evidence to show with any certainty that the primary driver of the Walleye population collapse in Lake Scugog is due to angling pressure. The OFAH acknowledges that recruitment failure is causing an issue with the Walleye fishery in Lake Scugog, and that action must be taken; however, regulatory changes should only be used after assessing the full range of possible tools to determine the ecological, social and economic impact of each option. Why were alternatives to fishing regulation changes not considered? Without additional strategies to address the recruitment failure of Walleye, the stand-alone regulatory options as proposed are not defensible. Additionally, the OFAH would like to point out that the ultimate goal of this proposal should be to ensure that there is a strong fishery for this species, as opposed to the streamlining of regulations.

The background document accompanying these proposals is inadequate considering the complexity of the problem facing the Walleye population in Lake Scugog, and the degree of impact the proposals that are being presented will have on anglers and the local community.

**MNRF Option 1)** Close winter walleye season (January 1 to the last day in February), maintain current summer walleye season (the season for Lake Scugog would then be aligned with the dates of the open walleye season for Fisheries Management Zone [FMZ] 17 [2<sup>nd</sup> Saturday in May to November 15]).

The OFAH does not support a winter closure of the Walleye fishery on Lake Scugog. The MNRF has not provided compelling evidence to show that the closure of a two-month fishery will have a significant enough effect on the Walleye population to generate a stock recovery that justifies the restrictions.

**MNRF Option 2)** Close summer and winter walleye seasons (long-term moratorium). Seasons for other fisheries remain open.

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The OFAH does not support this option because the MNRF has not provided enough evidence to show that the closure of the fishery addresses the recruitment failure issue, and will ultimately lead to a recovery of the population of Walleye in Lake Scugog. Additionally, the reopening of this fishery may never occur and, considering that Walleye were established in Lake Scugog through stocking to provide angling opportunities, this would seem contrary to the initial intent. A complete moratorium on Walleye fishing would limit available data to the efforts of the Kawartha Lakes Fisheries Assessment Unit (KLFAU). The reinstatement of the fishery will rely on the establishment of well-defined population benchmarks but with no data coming from creel surveys, only seasonal assessments will be available to evaluate the recovery (or decline) of the fishery. How confident is the MNRF that this level of data collection will properly represent the population of Walleye in Lake Scugog?

#### Recruitment Failure

The MNRF cannot demonstrate with confidence that a closure of the Walleye fishery will result in a recovery of the population in Lake Scugog. We are not convinced that the main driver of the current population level is angling pressure. Some large-bodied Walleye still persist in the system although no juveniles are reaching spawning size. If recreational harvest were the limiting factor, the population bottleneck would be associated with the slot size for Walleye on Lake Scugog. There would be young fish but very few of a size that would be legal for possession. Given there is little evidence of juvenile fish in the lake according to the KLFAU, there must be other sources of recruitment failure. There are a multitude of factors that are likely contributing to the Walleye declines, so why is only the fishery being shut down and no other action being proposed?

#### Recent Changes to the Lake

Changes to the fish community through the introduction of Bluegill and Black Crappie have had uncharacterized effects on the survivability of juvenile Walleye in Lake Scugog. In addition to changes in the fish community, there has been very little work done on the current condition of the Walleye spawning habitat on the lake. Good spawning habitat conditions and availability are directly proportional to spawning success and according to the MNRF, only historical data from the 1980s is available on the location and condition of this habitat. These are significant unknowns that have to be answered before the public commits to surrendering their ability to angle for Walleye on Lake Scugog.

#### Water Level Fluctuation

Another significant unknown is how water level manipulation impacts spawning success in the lake. Seasonal drawdowns of water levels have been shown to have devastating effects on fish populations when water levels become low enough that wave action can lead to air exposure or mechanical destruction of spawning habitat or eggs. The MNRF must determine how seasonal drawdowns are affecting the Walleye spawning habitat or spawning success on Lake Scugog. The Walleye Management Strategy found within the Fisheries Management Plan (FMP) for FMZ 17 (2009) identifies spring water level and flow fluctuations as the number one challenge for Walleye recruitment and there are several actions in the strategy/plan to improve Walleye recruitment. These actions should have been prioritized and implemented before a regulatory change was proposed. The MNRF must be more accountable for delivering and reporting on actions identified in their own management plans.

#### Stocking

To-date, the MNRF has been extremely resistant to proposals for stocking, citing complex fish species assemblages, increases in water clarity, and lake size, as well as budgetary constraints as insurmountable roadblocks to initiating a Walleye stocking program on Lake Scugog. The OFAH disagrees with the MNRF's assumption that the Walleye population would not respond favourably to supplementary stocking on a realistic and cost-effective level. Several examples exist regarding the rehabilitation of Walleye populations in complex fish assemblages in large waterbodies through supplemental stocking (e.g. reaches of the Grand River and Hamilton Harbour). The MNRF believes that a Lake Scugog Walleye stocking program would be classified as a rehabilitation program, but we would propose a different approach. Walleye were established in Lake Scugog artificially through stocking to provide a recreational fishery. While the characteristics of the lake have changed, the intent has not.

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Why would this situation be approached as anything other than a Put-Grow-Take (PGT) fishery in this circumstance? A PGT fishery is intended to provide recreational angling opportunities, as well as to divert pressure from lakes that support naturally reproducing populations. Additionally, a PGT fishery would be consistent with the actions outlined in the FMZ 17 FMP. Walleye fry stocking has been shown to bolster recruitment in times of failure and to provide little effect when juvenile recruitment is strong. Fry could come from a variety of sources such as surplus from the provincial Fish Culture Section or through local, volunteer-led community hatcheries. While fry may not be the preferred method of stocking by the MNRF, the cost and availability would be accessible. An excellent example of fry stocking leading to the recovery of a Walleye fishery can be found in Red Lake in Minnesota. This system experienced a Walleye population crash, which was reversed and recovered in under a decade simply through a Walleye fry stocking program, despite a very strong Black Crappie population. At the very least, this management option for Lake Scugog should be fully evaluated by the MNRF.

#### Socio-Economic Impacts

These proposed closures also present a great deal of unknowns related to socio-economic impacts. A full closure of the Walleye fishery could have significant impacts on the local economy that have not been analyzed or characterized. A cost-benefit analysis has never been presented to the public regarding these proposed changes and this leads the OFAH to ask the question: Does the MNRF understand what the impacts of either a winter closure or a full moratorium will be on the local community and economy?

#### OFAH Recommendations

Walleye management experts should be consulted regarding the seasonality of the regulations or the application of the harvestable slot size on Lake Scugog. Regardless of the outcome of this proposal, it is clear that work needs to be done to reverse the recruitment failure of Walleye. The MNRF needs to develop a better understanding of the mechanism behind the stock failure of Walleye in Lake Scugog. Work needs to be done to assess the condition of spawning habitat, and improvements should be made if necessary. The impacts of water level manipulation on spawning success needs to be characterized and any adjustments that are required should be communicated to Parks Canada, as they are in control of the Trent-Severn Waterway. Additional measures such as supplementary stocking should be examined closely, and experts in the field should be consulted to determine viable strategies. More information needs to be collected and presented regarding the socio-economic impacts of either a seasonal closure or a long-term moratorium. Furthermore, considerations must be made regarding changes to the fish community and the lake dynamics.

#### Conclusion

The OFAH was extremely disappointed in the process used by the FMZ 17 Council to discuss this very important issue. Although Lake Scugog Walleye were actively discussed for multiple years, the proposed management actions were rushed through council without sufficient information or time to make an informed decision. The OFAH was not in favour of only bringing the two selected options forward for public consultation, and we do not support either option for implementation. These options actually contradict actions identified in the MNRF's Walleye Management Strategy, which states that the open water Walleye fishery should be maintained. A closure in isolation of other recovery efforts is merely an attempt at placating the public rather than addressing the issue. Until the recruitment failure issue is properly addressed, fishing closures alone will do very little to recover the Walleye population in Lake Scugog. The MNRF has already developed a strategy to deal with the type of population issues that Lake Scugog is facing. These actions are outlined in the Fisheries Management Plan and should have been presented to the FMZ 17 council during the discussions on this issue.

Our submission is intended to provide realistic suggestions that may aid in the recovery of the Walleye population of Lake Scugog to ensure that a strong fishery for this species persists into the future.

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We look forward to working the MNRF and FMZ 17 Council to improve the Walleye population in Lake Scugog and maintain a healthy fishery.

Yours in Conservation,



Tom Brooke  
Fisheries Biologist

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cc: OFAH Board of Directors  
OFAH Fisheries Advisory Committee  
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