

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: 420A/794
June 6, 2016

E-MAILED

Ms. Natasha Carr, Regional Planning Biologist
Ministry of Natural Resources and Forestry
Regional Operations Division, Southern Region
300 Water Street, 4th Floor, South Tower
Peterborough Ontario
K9J 8M5

Dear Ms. Carr:

Subject: EBR Registry Number 012-3585: Fisheries Management Zone 18 Fisheries Management Plan

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 735 member clubs. We have reviewed the Fisheries Management Plan for Fisheries Management Zone 18 (hereafter referred to as the FMP) and, while we appreciate the opportunity to comment, we are concerned with the use of a survey to seek meaningful public input on the draft FMP. The use of a survey guides responses by presenting preconceived options which can potentially influence how the public views the topic.

General Comments

The OFAH strongly supports the sentiment found under the Fish Habitat Management Section of the Introduction in which the Ministry of Natural Resources and Forestry (MNR) suggests that fish habitat, in general, throughout Fisheries Management Zone 18 would benefit from substantial improvements rather than the further degradation of condition due to development. This echoes a point related to the amended Fisheries Act (2012) which removed the No Net Loss Principle from use. Rather than a slow degradation or No Net Loss policy, we should collectively be striving for a net gain in viable fisheries habitat to ensure our fisheries in perpetuity. While this was not a highlighted element of the plan, it is a critical position that should be adopted across all Fisheries Management Zones. Some consideration should be given to developing an understanding of habitat types that provide critical support for fisheries in FMZ 18. Using this information, resource managers could then apply a strategic approach to fisheries habitat management decisions.

Walleye and Sauger

The document states that the Walleye population in FMZ 18 is experiencing weak survival, citing the low percentage of the population that is at the maximum age for the species. Is the species being managed for a high proportion of the population to reach the maximum age? Typically, a slot limit is designed to protect the spawning population and to allow for several years of spawning in each individual while maintaining the opportunity for anglers to harvest a large-bodied "trophy" fish. This being the case, the notion of "success" would be the survival of a fish to the slot limit where it can successfully reproduce. The statement that survival is weak suggests that this is not occurring. What proportion of the population is surviving until they reach the slot size?

The OFAH is in full support of the goal to increase Walleye populations and improve Walleye angling and harvesting opportunities. Conversely, the strategy to address Objective 1 is to reduce angler harvest by the implementation of an existing harvestable slot limit. Our recommendation is to change this wording to "manage angler harvest" through the existing harvestable slot.

Ms. Natasha Carr
June 6, 2016
Page Two

The OFAH is also fully supportive of exploring Put Grow Take (PGT) Walleye fisheries in an effort to meet the harvest demand for the species, as it will support the above-mentioned goal, and will reduce angling pressure on other naturally-sustaining Walleye populations.

Regarding the establishment of new sanctuaries that would protect Walleye and/or Sauger spawning habitat, the OFAH is in support of seasonal sanctuaries where there is scientific evidence to show it is necessary for the conservation of that species in a particular waterbody, and effective at carrying out that goal. Additionally, simply closing off an area to use is often not sufficient. There should be an associated commitment by the MNR and its partners to ensure the viability of that protected habitat and to rehabilitate the habitat, if it is impaired.

Lake Trout Strategy

The OFAH is supportive of the proposal to collaborate with stakeholders, anglers, and researchers to determine the ideal sampling methodologies for coldwater species such as Lake Trout. As with the Walleye, we are also supportive of the continuation and exploration of new PGT Lake Trout fisheries in FMZ 18. We also recommend rewording of the first strategy from “reducing angler harvest” to “divert angler harvest.” This change emphasizes the goal of a PGT fishery, which is to divert pressure from naturally-reproducing population rather than reducing harvest.

Panfish Management Strategy

It is clear that the Broadscale Monitoring (BsM) protocol is ineffective at sampling centrarchid species as the number of fish per net between the Nearshore Community Index Netting (NSCIN) and the BsM are vastly different. This illustrates the need to ensure that additional monitoring is completed in addition to the BsM protocol to capture the entirety of the fishery within the zone, as it is suggested in the FMP.

Smallmouth and Largemouth Bass

Under Objective 1, the decline in the average size of bass harvested is attributed to an emphasis in the release of large-bodied fish. This statement needs to be further clarified or supported, as it is not inherently obvious to the reader as to how this works mechanistically. In a fishery primarily managed for bass, is there a necessity to encourage the harvest of panfish species? Is there research suggesting that the presence of Black Crappie or Bluegill will suppress a Largemouth or Smallmouth Bass population or growth potential or evidence that this is happening?

Muskellunge Strategy

As with the Centrarchid populations, the OFAH supports the development of a sampling protocol that would effectively characterize the Muskellunge population that occurs within FMZ 18.

Coldwater Fish Strategy

The OFAH is in favour of the objective to maintain the coldwater fish angling opportunities in FMZ 18. We strongly support the rehabilitation of degraded coldwater fish habitat, and the exploration of new angling opportunities through the creation of new PGT fisheries.

Other Fish Species Strategy

The OFAH is in support of the three objectives of this strategy, to maintain forage and coarse fish abundance; recruitment; and to promote angling opportunities for coarse fish species. The OFAH is highly supportive of the review of water management plans to minimize impacts to fish communities, as well as providing consideration to the conservation of all species of fish, regardless as to whether or not they are currently managed as sport fish in Ontario.

ONTARIO FEDERATION OF ANGLERS AND HUNTERS

Ms. Natasha Carr
June 6, 2016
Page Three

Commercial Fisheries

The OFAH agrees that it is critical to continue to monitor the commercial fishery in FMZ 18, as well as to strive for additional by-catch mitigation measures.

Invasive Species and Diseases Management Strategy

The OFAH is in full support of the goal to prevent the introduction and/or control the spread of invasive species and pathogens in FMZ 18, and we (the OFAH) will continue to be an active partner in that regard.

Public Awareness, Education, and Participation in Fisheries Management

The OFAH strongly agrees with the statement that the science supporting the sustainability of competitive bass fishing tournaments should be communicated to the public. This should be facilitated through partnerships with stakeholder groups, conservation organizations, and partner agencies.

Thank you for the opportunity to comment on the FMZ 18 Fisheries Management Plan, and for the continued opportunity to participate in the FMZ Advisory Councils.

Yours in Conservation,



Tom Brooke
Fisheries Biologist

TB/gh

cc: OFAH Zone F Executive
OFAH Fisheries Advisory Committee
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Manager, Fish & Wildlife Services
OFAH Fish & Wildlife Staff