

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ottawa Conservation Centre

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OFAH FILE: 420A/794
June 2, 2016

Mr. John Boos, Regional Planning Biologist
Ministry of Natural Resources and Forestry
Regional Operations Division
300 Water Street
4th Floor, South Tower
Peterborough, Ontario
K9J 8M5

Dear Mr. Boos:

Subject: EBR Registry Number 012-6583: Fisheries Management Zone 12 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 12 (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 guide's responses by presenting pre-conceived options can potentially influence how the public views the topic.

General Comments

We have been supportive of the development of Fisheries Management Zone (FMZ) Advisory Councils to engage stakeholders in fisheries management decisions, and we appreciate the continued opportunity for OFAH representatives to provide input into this process. In general, the OFAH is in support of the six primary goals of the plan: 1) to maintain healthy and connected ecosystems; 2) achieve sustainable use of the fisheries resource; 3) effectively manage the fishery between Quebec and Ontario; 4) enhance the understanding of the fishery; 5) educate, inform and engage the public and stakeholders; and 6) develop partnerships.

Mortality is referenced several times throughout the document. It would be helpful to know if it is total mortality, angling or natural mortality for the reader to be able to conceptually compare between species.

4.4 Monitoring strategy for fisheries if the Ottawa River

While the OFAH is in support of the Broadscale Monitoring (BsM) program, we also strongly recommend the development of a supplemental monitoring protocol to capture the necessary data to effectively manage the species that have been identified in the FMP as not being well suited to the BsM sampling protocol (i.e. panfish, Black Basses, and Muskellunge). Panfish and Black Basses are the first and second most popular fish species assemblages, and Muskellunge are a world-class trophy species in the Ottawa River. As such, these species should be considered a critical priority for this FMP.

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4.2.5 Panfish (Perch, Sunfish, Crappie, Rock Bass and Bullheads)

There is general support for the proposed panfish management goals and objectives, and we support many of the proposed actions associated with panfish (i.e. sunfish, crappie, and perch) management. However, we are not convinced it makes sense to include Brown Bullhead and Rock Bass under the same proposed management objectives for other panfish species. Typically, panfish are considered smaller bodied centrarchids like Bluegill (*Lepomis macrochirus*), Pumpkinseed (*Lepomis gibbosus*), White or Black Crappie (*Pomoxis* Spp.), and can include Yellow Perch (*Perca flavescens*). Brown Bullhead and Rock Bass are currently not regulated by seasons or limits, so what is the intent of including them with regulated species within the FMP? We would not support extending regulation to these species without further justification. We also suggest that while bullheads are being combined with panfish because of their relatively small average body size, they be separated from panfish consistently throughout the document (i.e. panfish and bullhead).

4.2.1 Walleye and Sauger

Under the proposed management objectives for Walleye and Sauger, the OFAH suggests that Objective "I" should be changed to include enhancement of the Walleye and Sauger population.

We are interested in a clarification differentiating between the most "actively fished" species in the zone and the most "popular" species. According to the FMP, Walleye and Sauger are the most actively fished species; however, they are not among the three (3) most popular in the zone.

4.2.2 Smallmouth and Largemouth Bass

The OFAH is highly supportive of the management goal to maintain a high quality bass fishery throughout the Ottawa River.

4.2.3 Northern Pike

Caution should be exercised when determining minimum size limits of Northern Pike to encourage larger "trophy" fish in areas where Northern Pike and Muskellunge distributions overlap. These species do compete directly and, if the goal for Muskellunge is to provide a world-class trophy fishery, encouraging the increase in abundance of another large-bodied apex predator may be counter-productive.

It is also critical that we point out that the maintenance of the ability to catch Northern Pike with the intent to consume is considered when discussing any type of minimum size restriction.

4.2.4 Muskellunge

We support the proposed management goal and current regulations for Muskellunge. We also agree that any expansion of the 54" size limit to the Ottawa River tributaries needs to be fully investigated to determine whether an increase is appropriate and supported by adjacent fisheries management zones.

4.2.6 Channel Catfish

The direction to further exploit this species is confusing in the document because as it is described, the species would do very poorly if exploited commercially. What is the desired outcome of this management action?

4.5 Fish Habitat Management Strategy

Regarding the Fish Habitat Management Strategy, it should be pointed out that according to the Fisheries Act, the imperative to avoid impacts to fisheries supersedes the development of mitigation measures. This hierarchy, however, is not dealt with at all leading the reader to believe that avoidance is not an option. The OFAH is fully supportive of the proposed management goal to maintain, enhance, and restore fish habitats critical to the sustainability of fisheries and to produce healthy fish that are safe to eat.

To clarify, is the intent of management Action 1, to identify critical fish habitat throughout the zone to improve prioritizations of habitat management actions?

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4.3 Species at Risk Fishes

Rather than awaiting a government response statement, discussions through the Ottawa River Management Group (ORMG) should prioritize bringing the fishery for American Eel and Lake Sturgeon into alignment across the river.

4.7 Commercial Fisheries

The OFAH is supportive of the proposed management actions for commercial fisheries management, specifically the action for assessing annual commercial fishing quotas to ensure sustainability and balance with other users.

4.8 Management Strategy for Invasive Species and Diseases

We support the proposed management strategy for invasive species and diseases. While live baitfish are a potential vector for waterborne pathogens, they are by no means the only pathway. The OFAH suggests the removal of the words "on live baitfish" in paragraph four on page viii regarding the potential spread of Viral Hemorrhagic Septicaemia (VHS). It could influence anglers to not use live bait and lead recreational boaters to think that there is no danger of them spreading waterborne pathogens (particularly VHS) between waterways if they do not properly clean their equipment. Additionally, it is important to include the prevention of further spread alongside the promotion of control and eradication of aquatic invasive species and diseases.

The use and transport of live northern leopard frogs for bait in Ontario is still permitted. We are not aware of any requirement to regulate their use and transport to slow the spread of invasive species and disease. We recommend providing clarification around the legal use and transport of frogs in Ontario or removing this statement from the FMP.

Under the potential sources of invasive species and diseases, we strongly recommend removing "fish stocking of non-native trout species," as it is entirely misleading in this context. Unauthorized introductions are a concern and would be more appropriate to highlight this within the FMP.

Thank you for the opportunity to comment on the FMZ 12 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 Board of Directors
OFAH Fisheries Advisory Committee
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Manager, Fish & Wildlife Services
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