

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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July 18, 2016

Mr. Rick Hornsby, Park Superintendent
Ministry of Natural Resources and Forestry
Provincial Services Division
Ontario Parks
Killbear Provincial Park
35 Killbear Park Road
Nobel, Ontario
P0G 1G0

Dear Mr. Hornsby:

Subject: EBR Registry Number 012-7619: Amendments to Killbear Provincial Park Boundary – Crown Land Use Amendment 2014-001

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, subscribers and supporters, and 735 member clubs, we have reviewed the Amendments to Killbear Provincial Park Boundary – Crown Land Use Amendment 2014-001, and have the following concerns and comments.

The OFAH actively represents the interests of anglers and hunters during the development of legislation, regulations, policy, and strategies related to land use across Ontario. The protection and conservation of lands in Ontario through the *Provincial Parks and Conservation Reserves Act* plays an important part for the propagation of rare and sensitive habitat and the continuation of species at risk. Yet it has been repeatedly shown through long-term research and observation that classic preservationist/passive management can ultimately result in ecosystem, biodiversity, and population degradation. Research suggests this is due to the alteration or elimination of ecological functions and processes through human activity. These activities includes disturbance and alteration like development, the elimination of natural disturbance/processes through fire and flood suppression, and the historical removal of predatory species. These activities result in soil and nutrient disruption, hydrological alterations, decreased predation, increased survivability, and alteration of successional pathways. Natural functions like fires, flooding, population cycling, disease cycling, and others will occur regardless of efforts to suppress them, therefore, it becomes more important to use every management tool available to ensure ecological integrity by simulating the processes that have been altered or removed. The maintenance of any specific ecosystem, habitat, or community within a specific localized area requires active management of ecological functions and driving forces. As such, we do not support the elimination of low-impact and sustainable recreational activities/management tools like hunting, angling, and trapping unless there is evidence to support it. Therefore, we do not support the addition of lands to the Killbear Provincial Park where hunting will not be permitted.

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This region has a rich history of low-impact land use for angling, hunting and trapping. This is especially evident within the history mentioned in the Killbear Park Management Plan that specifically mentions the history of wildlife management research and white-tailed deer habitat management. Terrestrial resource use activities like hunting and trapping have coexisted on these lands with many species at risk, including the Massasauga rattlesnake, and could be used as a management tool to ensure ecological integrity for species at risk. This area has a high population of white-tailed deer and, without natural predation, which would have historically occurred at a higher rate, or population management through licensed hunting, there is a high potential for degradation related to high deer density. Overgrazing/browsing resulting in species and age composition changes in plant communities has been observed in areas with extremely high deer density resulting in both direct depredation and damage to threatened flora and habitat destruction for both fauna and flora. High deer populations also increase the potential for disease vector issues between deer and other cervids, like the transfer of the parasite *Parelaphostrongylus tenuis* (commonly known as brainworm), which is fatal in moose. These avoidable problems will not only impact the habitat and biodiversity within the park but surrounding areas.

Though management through licensed hunting and trapping may not be endorsed by all cottage owners in close proximity and others who use the park due to perceived risks, the fact remains that these activities are a scientifically sound, effective, safe, sustainable, and provincially/federally protected cultural activity that can help ensure the ecological integrity of the park. Evidence and science-based management is needed to ensure the integrity of all regions in Ontario, but is especially important in Ontario's parks, which are supposed to be benchmarks for biodiversity and habitat health in Ontario.

The removal of lands used for the municipal waste management facility, resulting from boundary errors in the past is supported by the OFAH. The lands that are being added to the park were purchased by the Province for the purposes of expanding the park, but extenuating circumstances resulted in the lands becoming "General Use" Crown lands prior to becoming part of the park. Addition of deeded land purchased by the Province to parks does not initiate a mandatory consultation, so the current addition of 132ha in Lots 64 and 65 Concession 8 would not have triggered a consultation on its own. Therefore, we believe that any addition to a park should have mandatory consultation, especially when lands become Crown lands prior to being amalgamated in a park.

The OFAH wishes to be involved with the development of Park Management Plans and boundary development for protected areas in the province. We look forward to receiving feedback on our current contribution, and would welcome any invitation to contribute in the future.

Yours in Conservation,



Robert Cole
Land Use Policy and Habitat Specialist

RC/gh

cc: Gerry Haarmeyer, President, Parry Sound Anglers & Hunters
OFAH Land Use/Access/Trails Advisory Committee
Angelo Lombardo, OFAH Executive Director
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