

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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OFAH FILE: 420/422
February 21, 2017

Mr. Jim McCormack, Director
Parks, Recreation and Culture
Municipality of Port Hope
56 Queen Street
Port Hope, Ontario
L1A 3Z9

Dear Mr. McCormack:

Subject: The implementation of a Municipal Access Fishing Pass to the Ganaraska River

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, supporters and subscribers, and 740 member clubs, we are writing to express our opposition and disappointment at the Town of Port Hope's proposed intention to restrict access to a public fisheries resource within town boundaries through a municipal access fishing pass. We hope our comments will be seriously considered before the Town of Port Hope pursues a path that could lead to grave implications for the tourism in Port Hope, the Ganaraska River fishery and potentially angling in Ontario in general.

As you know, the OFAH has been involved since 2015 in efforts to address issues with the Ganaraska River fishery with the town, the Port Hope Police Service, the Ministry of Natural Resources and Forestry (MNRF), and the Ganaraska River Conservation Authority (GRCA). In addition to participating in discussions and formal meetings, the OFAH contributed media and social media outreach to anglers and provided a staff biologist to help train town police officers on how to identify common fishing practices and possible suspicious illegal behaviours by poachers.

The collective partnership came up with awareness and enforcement solutions to address issues of illegal angling, outright poaching, and angler behaviour, which were implemented in the fall of 2016. By all indications, those efforts had positive results in their first year and further improvements were expected, as anglers and poachers progressively familiarized themselves with the new enforcement landscape.

It was, therefore, with great surprise to learn the town has dispensed with patience and is examining an approach that is unacceptable to us, as a partner and as a provincial angling organization dedicated to open access to public fishery resources. We believe the town did not seriously examine other opportunities to raise the revenue necessary to support enforcement and cleaning station operations, such as parking fees, concessions, or secondary revenue streams. We consider the proposal of a municipal access fishing pass to be intended to create a restrictive private fishery that drives the majority of anglers away, leaving the fishery to an elite few. ***Has the town done a thorough cost-benefit analysis to determine true estimates of expenditures and revenues of each potential option? Has the town estimated the lost revenue to local businesses as a result of anglers being deterred from fishing in Port Hope?***

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Besides the logistical and legal complexities that would accompany a proposal to implement a municipal access fishing pass on town/conservation authority property, *has Port Hope Council discussed the potential future implications related to administration requirements, enforcement, partnerships and general fisheries management on the Ganaraska River should they proceed with this pass?*

This proposal contradicts provincial policy to encourage angling as recreation and use of our natural resources. Please note that the MNR does not support the town's proposal and they have not identified a conservation concern requiring the implementation of restrictions that would reduce the numbers of anglers on the river.

Anglers unwilling or unable to afford the municipal access fishing pass, and individuals that would exploit the resource through illegal activities, will move to other nearby tributaries and communities. While this may on the surface seem like a positive for Port Hope, it will have a direct implication on provincial enforcement in the town. The MNR's enforcement branch allocates its resources based on need, and with anglers moving to adjacent tributaries, the MNR's enforcement branch will have to allocate its resources accordingly. *Has the town had discussions with MNR to determine the enforcement allocations that could result from this proposal?*

The Lake Ontario Atlantic Salmon Restoration Program (LOASRP), a partnership between the OFAH and the MNR, has focused a great deal of effort on the Ganaraska River. The recent (2016) stocking of yearling Atlantic Salmon to create a fishery in the Ganaraska River is an excellent example of the unique angling opportunity that is currently being cultivated through our partnership. This initiative was not intended to create an exclusive fishery for a few anglers and the implementation of this municipal access fishing pass would certainly call into question the future of investing in an Atlantic Salmon fishery on the Ganaraska River. According to the MNR's Fish Stocking Guide (2002), "any waterbody stocked by MNR or one of its partners must have public access to justify hatchery stocking." By extension, the current placement of the new Riverwatcher fish counter, a unit that uses video and live-streaming capabilities to showcase the seasonal salmon and trout migrations (both fall and spring) in the Ganaraska River will be similarly called into question as it was funded to support the LOASRP.

This proposal would create inequality because fishery access would be determined by financial status, placing an unfair burden on anglers with limited financial resources. While we accept the Town of Port Hope is free to focus on its own self-interest, the implementation of a municipal access fishing pass could be expected to follow in other communities, leaving anglers everywhere facing significant additional costs to their recreation. In the case of tributary anglers, they could end up paying in the hundreds of dollars to access multiple tributaries. Many of these fisheries are possible through the dedication and effort of anglers from around Lake Ontario and through international partnerships with New York State. The Ganaraska River is part of the greater lake-wide community and the OFAH would happily continue to work with the town on current strategies to mitigate illegal behaviour associated with the salmon fishery that do not include restricting access.

With respect to the proposal to close fishing at night, we would support this approach on a trial basis, but would suggest the town and province look at a more practical time period for the closure, such as half-an-hour after sunset to half-an-hour before sunrise, or a 5:00 a.m. opening to allow anglers arriving from out of town to set themselves up on the river at first light.

In summary, the implementation of a municipal access fishing pass in the Town of Port Hope:

- is strongly opposed by the OFAH;
- is not supported by the MNR, the agency responsible for managing Ontario's natural resources;
- will significantly reduce MNR enforcement presence in Port Hope;
- could result in unintended consequences of increased administrative burden and revenue loss;
- will force the Lake Ontario Atlantic Salmon Restoration Program to re-evaluate future investments in the Ganaraska River fishery and the new fish counter;
- undermines the great strides in education and outreach made by the town and partners in 2016; and
- will not result in true augmentation of the angling and tourism opportunities related to the Ganaraska River that are key to the town's requirement for more revenue generation.

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The OFAH would sincerely like to see a vibrant, diverse, and accessible fishery that can be enjoyed by all responsible anglers on the Ganaraska River. This fishery will have the greatest benefits for anglers and Port Hope. We recommend extreme caution in pursuing this current notion of a restricted fishery and hope that our above concerns are weighed against the limited potential financial gain that the town may stand to make through this proposed municipal access fishing pass.

Yours in Conservation,

A handwritten signature in blue ink that reads "Matt DeMille". The signature is written in a cursive style with a large, stylized "D" in the middle.

Matt DeMille, M.Sc.
Manager, Fish & Wildlife Services

MD/gh

cc: Honourable Kathryn McGarry, Minister of Natural Resources and Forestry
OFAH Zone E Executive
OFAH Fisheries Advisory Committee
Angelo Lombardo, OFAH Executive Director
Tom Brooke, OFAH Fisheries Biologist
Dawn Sucee, OFAH Fish & Wildlife Biologist
Chris Robinson, Atlantic Salmon Restoration Program Coordinator