

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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Ms. Jennifer McKay, Acting Coordinator
Ministry of Natural Resources and Forestry
Policy Division
Natural Resources Conservation Policy Branch
Protected Areas Section
300 Water Street
Peterborough Ontario
K9J 8M5

Dear Jennifer:

SUBJECT: Ecological Integrity in Ontario's Provincial Parks and Conservation Reserves – A Discussion Paper

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 740 member clubs. Thank you for providing the public with an opportunity to submit input on the Discussion Paper on *Ecological Integrity in Ontario's Provincial Parks and Conservation Reserves*. Our comments relate mainly to the sustainable use of natural resources and the benefits to ecological integrity – please give them due consideration in the development of the final document.

Ontario's protected areas system provides tremendous natural, social, and economic benefits to the province. The system helps to protect biodiversity, species at risk, and rare habitats while also providing countless opportunities to recreate and connect with nature. But despite protection, or perhaps because of it, certain natural processes have been eliminated from many landscapes and diminished ecological integrity.

Hunting restrictions in urban areas and parks allow deer populations to grow beyond the carrying capacity of the landscape. The scientific literature is replete with evidence for the negative effects of hyperabundant deer populations (see Russell et al. 2001 for an extensive review). As a keystone herbivore, white-tailed deer can dramatically alter the composition and structure of a forest, potentially extirpating browse-sensitive species. The reduction/elimination of browse-sensitive vegetation can alter the microclimate of the forest floor, which has cascading effects on forest-dwelling insects, spiders, and the bird species that depend on them for food (Baiser et al. 2007). Over-browsing of native vegetation by deer also creates a pathway for the establishment of invasive species, which also threaten park values and Ecology Integrity (EI).

The maintenance and improvement of EI in such a diverse park system will require a variety of tools in the "toolbox." We recognize that each protected area might require a unique approach to maintaining EI, but it is vital that Ontario Parks recognize the utility of sustainable resource use in protected areas and include it in the list of potential tools. Sustainable use activities, such as hunting, trapping and forestry, should not be prohibited as a "default" policy in Ontario's protected areas. Depending on the park, its objectives, and the pressures it faces, these sustainable use activities can be used as effective, low-cost solutions to achieve EI targets.

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We acknowledge the difficulty in determining a baseline condition against which EI improvements can be measured. There are advantages and disadvantages associated with each option, but we agree that a “pre-industrialization” condition is an unrealistic option due to ongoing and inevitable changes, the lack of information available for many areas, and the amount of time and resources that would be required to achieve any tangible improvement in EI.

We commend the Ministry of Natural Resources and Forestry (MNRF) for explicitly recognizing in the Discussion Paper the need to actively manage (through hunting, trapping, targeted removal, etc.) hyperabundant and invasive species in protected areas. The OFAH has been recommending this approach for some time and we are keen to see it implemented at a provincial scale for species like white-tailed deer, double-crested cormorants, and invasive mute swans.

We recommend that there be a review of the current policy framework to ensure sustainable use activities like hunting, trapping, and fishing be permitted in provincial parks unless there is specific evidence to demonstrate that they are not consistent with ecological integrity objectives for a given park. This should include fair access to opportunities for both Indigenous and non-Indigenous resource users.

Thank you for the opportunity to provide input.

Yours in Conservation,



Mark Ryckman, M.Sc.
Manager of Policy

MR/gh

cc: Matt DeMille, OFAH Manager, Fish & Wildlife Services

Literature Cited

Baiser, B., J.L. Lockwood, D. La Puma, and M.F.J. Aronson. 2007. A perfect storm: two ecosystem engineers interact to degrade deciduous forests of New Jersey. *Biological Invasions*. DOI: [10.1007/s10530-008-9247-9](https://doi.org/10.1007/s10530-008-9247-9).

Russell, F.L., D.B. Zippin, and N.L. Fowler. 2001. Effects of White-Tailed Deer (*Odocoileus virginianus*) on Plants, Plant Populations and Communities: A Review. *American Midland Naturalist* 146(1): 1-26.